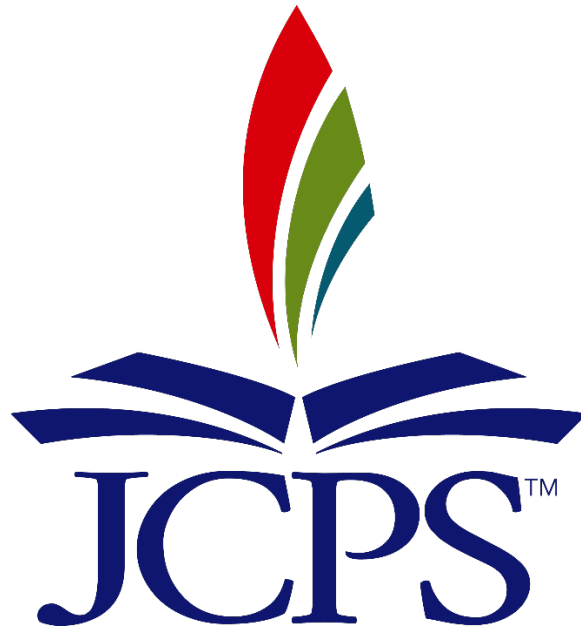




A Special Examination of Jefferson County Public Schools

June 30, 2026

ALLISON BALL, AUDITOR OF PUBLIC ACCOUNTS

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ALLISON BALL
AUDITOR OF PUBLIC ACCOUNTS

June 30, 2026

Dr. Brian Yearwood, Superintendent
Jefferson County Public Schools
VanHoose Education Center
3332 Newburg Road (3rd Floor)
Louisville, KY 40218
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Dear Superintendent Yearwood,

The Auditor of Public Accounts (APA) has completed its limited-scope special examination of the Jefferson County Public Schools. The purpose of this special examination was not to provide an opinion on financial statements but to review specific matters and to make recommendations to strengthen and improve internal controls and operations. This report summarizes the procedures performed and communicates their results. Detailed findings and recommendations based on our special examination are presented in this report to assist management in implementing corrective action. A list of all findings and recommendations is in the Exam Overview section.

Under KRS 43.090(1), “[w]ithin sixty (60) days of the completion of the final audit or examination report, the agency to which an Auditor’s report pertains shall notify the Legislative Research Commission and the Auditor of the audit recommendations it has implemented and of the audit recommendations it has not implemented. The agency shall state the reasons for its failure to implement any recommendation made in the final audit or examination report. All audit reports and agency responses shall be, subject to KRS 61.870 to 61.884, posted online in a publicly searchable format.”

We greatly appreciate your cooperation and professionalism and that of your staff throughout the examination. Their timely responses, openness in sharing information, and willingness to engage in constructive discussions significantly contributed to the examination’s efficiency and effectiveness. If you have any questions, please contact Bryan Morrow, Executive Director of the Office of Special Examinations, at bryand.morrow@ky.gov.

Respectfully submitted,

Allison Ball
Auditor of Public Accounts



PROJECT BACKGROUND & METHODOLOGY

ACKNOWLEDGEMENTS

The Kentucky Auditor of Public Accounts (APA), under the leadership of Auditor Allison Ball, and in collaboration with Public Consulting Group LLC (PCG), would like to thank the many individuals who made this report possible. We acknowledge the commitment and support of the Jefferson County Public Schools (JCPS) staff who were professional, courteous, and responsive to our many questions and requests throughout this process. The team would like to thank Superintendent Dr. Brian Yearwood, (retired) Chief of Accountability, Research, & Systems Improvement Division, Dr. Dena Dossett, Chief of Staff, Dr. Katy DeFerrari, and Director of Internal Audit, Mayria Porter, for their invaluable support, collaboration, and provision of necessary data and document requests essential to our analysis.

Auditor of Public Accounts

The APA ensures public resources are protected, accurately valued, properly accounted for, and effectively employed to raise the quality of life of all Kentuckians. The APA conducts financial audits, agreed-upon procedures, and special examinations of various state agencies, fiscal courts, sheriffs, county clerks, property valuation administrators, and other agencies that receive public funding. The APA considers requests for examinations from public officials, the general public, the Legislative Research Commission, and the Governor's Office.

The Office of Special Examinations (OSE) within the APA performs special examinations to investigate allegations of suspected fraud, waste, or abuse. These examinations are designed to provide an assessment of the facts gathered during the examination pertinent to the specific scope developed by OSE and APA leadership. Special examinations do not provide an opinion on financial statements; however, they do make recommendations to strengthen and improve internal controls, ensuring that operating activities are consistent, transparent, and statutorily compliant.

The Office of State Government Audits and Technology (OSGAT) assisted OSE with the JCPS special examination. OSGAT is responsible for comprehensive audits of state government entities. OSGAT performs the audit of the Commonwealth of Kentucky's Annual Comprehensive Financial Report and Statewide Single Audit of the Commonwealth of Kentucky, as well as other audits, agreed-upon procedures, and special examinations related to state government entities.

Public Consulting Group LLC

PCG is a management consulting firm that offers technical assistance, strategic planning, professional development, financial management, systems development, and other management advisory services to public sector clients. Established in 1986, PCG has consistently delivered on its motto of "*Solutions that Matter.*" PCG's education practice is committed to helping schools, school districts, and state education agencies strengthen their performance, streamline their operations, and improve their programs and instruction so that all students have what they need to succeed.

SCOPE & OBJECTIVES FOR SPECIAL EXAMINATION

2024 Kentucky House Bill 6 (HB 6) requires the APA to conduct a special examination of JCPS, and it provides an appropriation for the APA to do so.

In February 2025, APA contracted with PCG, a firm with experience performing organizational assessments and reviewing the programs and operations of large school districts and state education agencies, to support the examination. APA and PCG worked closely as a team on the examination and are henceforth referred to as the report author, including terms such as "the exam team," "we," and "the examiners."

In accordance with HB 6, APA conducted a comprehensive examination of JCPS. Generally, this special exam was an overall assessment of District operations.

This report relays the outcome of this special examination and contains key observations, findings, and recommendations. Its purpose is to help JCPS operate efficiently and effectively to improve student achievement, ensure the responsible use of funds, and provide a safe learning and working environment for all students and staff across the district. While JCPS, of course, has many district-specific issues, the hope is that this report will also serve as a useful guide for all of Kentucky's school districts thinking about improvements they can make for the benefit of Kentucky's students, parents, teachers, and all other school district personnel.

Given the breadth of this scope, the team was not able to review all topics with the same level of intensity. As such, observations highlight areas believed to warrant deeper study.

The exam focused on the July 1, 2022 – June 30, 2025 period; however, the report may present data beyond the three-year timeframe to provide context or present relevant additional information collected. This special examination seeks to document the organization and operation of JCPS at a moment in time. Data collection occurred between April 2025 and May 2026, spanning both the 2024-25 school year and the 2025-26 school year.

Data collection and analysis have occurred alongside daily JCPS operations and extensive District changes, including a new Superintendent, major budget cuts, an organizational restructuring, and the planning for a new strategic plan. Additionally, during the course of this examination, the District used third-party vendors to conduct two separate exams related to JCPS's budget deficit and financial forecasting. Our report endeavors to present the clearest portrait of JCPS despite the dynamic situation.

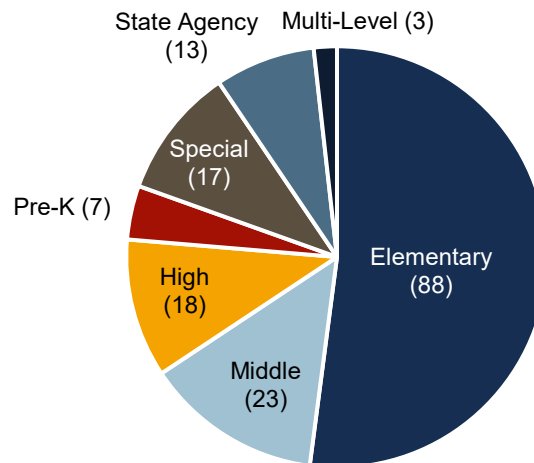
Jefferson County Public Schools

Serving one in seven students in Kentucky, JCPS is an urban school district in the Louisville Metro Area, enrolling over 97,400 students.¹ The District consists of nearly 170 schools and learning centers, including elementary, middle, and high schools, as well as pre-K centers, special schools, and state agency schools. Over half of the schools in the District are elementary-level, with 88 schools serving over 35,600 elementary students. Special Schools serve approximately 2,200 students, representing the smallest proportion of the JCPS student population. Only three schools serve multiple student levels.

The number of schools and learning centers, as well as JCPS's FY25 student enrollment are presented in Figure 1 and Figure 2 below.

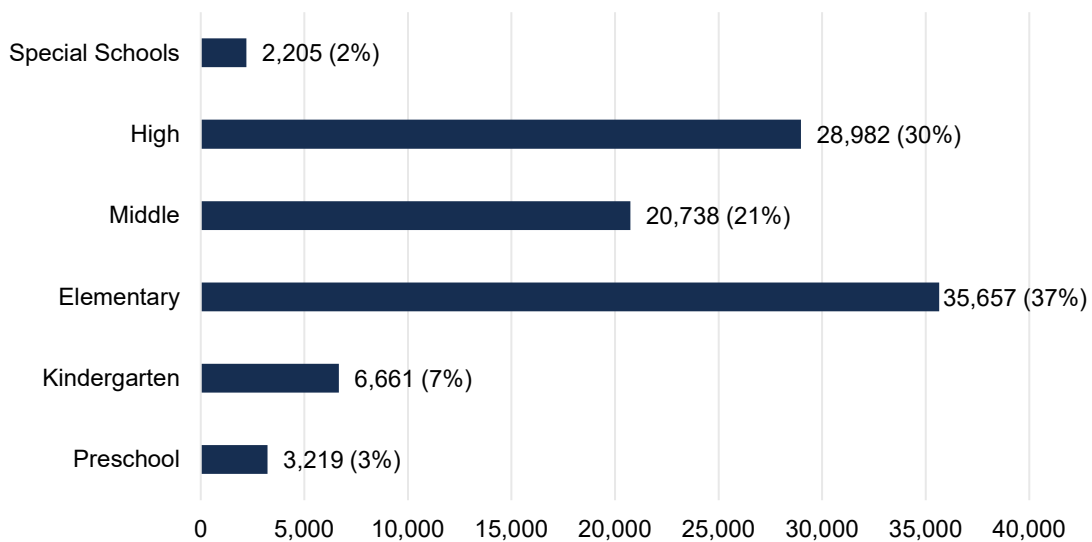
¹ "[About JCPS.](https://www.jefferson.kyschools.us/page/about)" Jefferson County Public Schools. Retrieved December 29, 2025.
<https://www.jefferson.kyschools.us/page/about>

FIGURE 1: JEFFERSON COUNTY PUBLIC SCHOOLS AND LEARNING CENTERS, FY25



Source: Jefferson County Public Schools FY25 Annual Comprehensive Financial Report.

FIGURE 2: JEFFERSON COUNTY PUBLIC SCHOOLS STUDENT ENROLLMENT, FY25



Source: Jefferson County Public Schools FY25 Annual Comprehensive Financial Report.

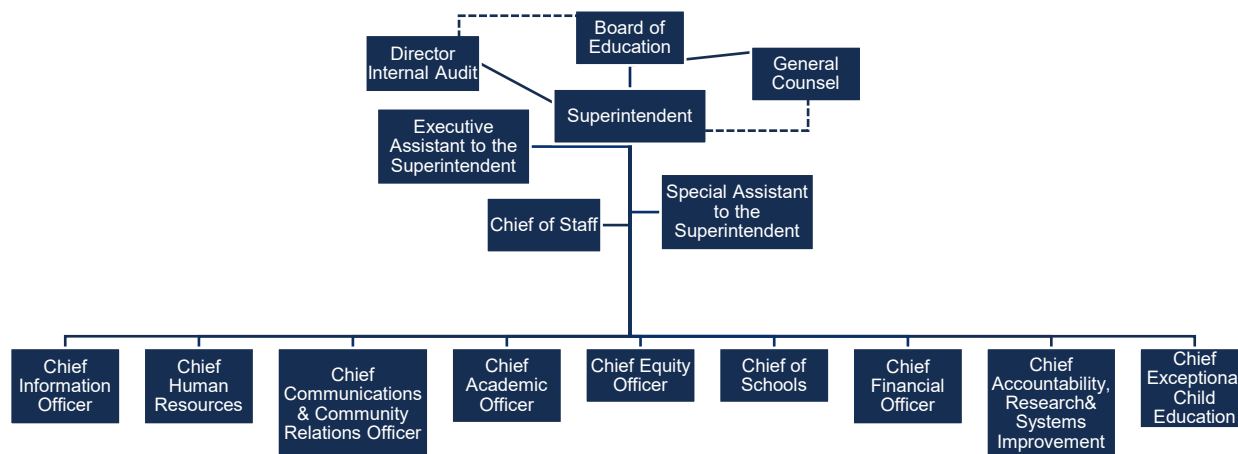
JCPS is governed by the Jefferson County Board of Education (JCBE), which is made up of seven Board Members, each representing one of the seven Board of Education Districts in JCPS. The Board's overall responsibility is to oversee District operations, developments, and improvements across JCPS.²

As seen in Figure 3, as of December 2025, JCPS leadership consists of the JCBE, the Superintendent, and Chiefs overseeing 14 divisions and offices: Academics; Accountability, Research, and Systems Improvement (ARSI); Office of the Chief of Staff; Communications & Community Relations; Diversity, Equity, & Poverty (DEP); Exceptional Child Education; Financial Services; General Counsel; Human

² "Jefferson County Board of Education." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/board-of-education>

Resources; Internal Audit; JCPS Police Department; Operations Services; Schools; and Technology. The Organizational Chart, along with the Division and Office descriptions below, represent the District during the time of the review, prior to the introduction and approval of the updated Organizational Chart in February 2026.

FIGURE 3: JEFFERSON COUNTY PUBLIC SCHOOLS ORGANIZATIONAL CHART, DECEMBER 2025



Source: Jefferson County Public Schools Organizational Charts website.

The JCBE governs JCPS, overseeing the Superintendent who leads the District and oversees District operations and Division chiefs. As described by JCPS, its 14 divisions and offices are as follows.

The **Academics Division** provides resources for schools and opportunities for learning in an effort to serve the students in JCPS. This division includes extended programs and student learning, Journey to Success (JTS), the Office of Multilingual Learners (OML), professional development and learning, Success League, and Titles I, II, and IV.³

The **Accountability, Research, & Systems Improvement (ARSI) Division** focuses on accountability and data systems, research and evaluation, systems improvement, resource development, and testing in the District. Within the accountability department, ARSI is responsible for providing guidance to schools around Kentucky's accountability system, assisting with Open Records Requests, and supporting state and federal assessments. The accountability department also conducts the districtwide Comprehensive School Survey (CSS) and maintains school profiles and graduate outcomes. The research and evaluation department provides research and program evaluation services. ARSI also supports schools and the district with improvement planning by working as a liaison between JCPS and the Kentucky Department of Education (KDE) Division of Schools and Program Improvement.⁴

The **Office of the Chief of Staff** supports district leadership through both board management and assisting the superintendent with his day-to-day needs. The office also oversees student support, safety, and non-instructional projects, which include culture and climate, project management, health services, and student

³ "JCPS Academics." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/academics-division>

⁴ "Accountability, Research, & Systems Improvement." Jefferson County Public School. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/accountability-research-systems-improvement-division>

support services throughout the district. The JCPS Police Department was housed under the Office of the Chief of Staff until it became its own division.⁵

The **Communications and Community Relations Division** promotes all forms of communication between JCPS and its stakeholders. It develops and implements communication strategies, creates marketing materials, manages social media channels, fields media inquiries, and organizes and promotes events throughout the district.⁶

The **Diversity, Equity, and Poverty (DEP) Division** monitors, manages, and mitigates equity solutions, problems, and disproportionality throughout the District while also engaging the community around educational outcomes as they relate to equity. It includes the Access and Opportunity Office, the Community Schools program, oversees resources for Deferred Action for Childhood Arrivals (DACA), oversees School-Based Decision Making (SBDM) councils, and promotes racial equity in JCPS by maintaining the Racial Equity Policy, DEP Anchor documents, and school and district-level racial equity plans.⁷

Exceptional Child Education oversees programs designed to meet the needs of students with educational disabilities. This division also includes Early Childhood, the Gifted and Talented/Advanced Program, and Section 504.⁸

The **Financial Services Division** maintains financial integrity and implements controls and policies to serve employees, students, and parents efficiently. Operations in this division include accounting, accounts payable, grants and awards accounting, payroll and cash management, purchasing, and insurance.⁹

General Counsel oversees legal matters in JCPS and ensures the District operates within the law. It includes both general counsel and compliance and investigations. Assistant general counsels in JCPS are hired for their subject-matter expertise and oversee specific areas: compliance and investigations; student support; contracts, insurance, and data sharing; and human resources. From around 2012 until the current General Counsel was hired in 2018, JCPS had no general counsel and relied solely on outside counsel.

The **Human Resources Division** oversees recruitment, hiring, and retention in JCPS with an effort to ensure a diverse and highly qualified workforce. Within Human Resources, there are four departments: Employee Services, Personnel Services, Recruitment, and Labor Management and Employee Relations.¹⁰

The **JCPS Police Department** ensures safety in JCPS during school hours by employing professional-certified police officers.¹¹

The **Operations Services Division** maintains the district's fleet of vehicles, sets bus routes, manages facilities and grounds, and oversees school and community nutrition to provide a positive learning environment for students and staff by ensuring the District runs smoothly and safely.¹²

⁵ "Office of the Chief of Staff." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/chief-of-staff-office>

⁶ "Communications & Community Relations Division." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/communications-community-relations-division>

⁷ "Diversity, Equity, and Poverty (DEP) Division." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/diversity-equity-and-poverty-division>

⁸ "Exceptional Child Education." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/exceptional-child-education>

⁹ "Financial Services Division." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/financial-services>

¹⁰ "Human Resources Division." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/human-resources>

¹¹ "JCPS Police Department." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/police>

¹² "Operations Services Division." Jefferson County Public Schools. Retrieved December 29, 2025. <https://www.jefferson.kyschools.us/page/operations-services-division>

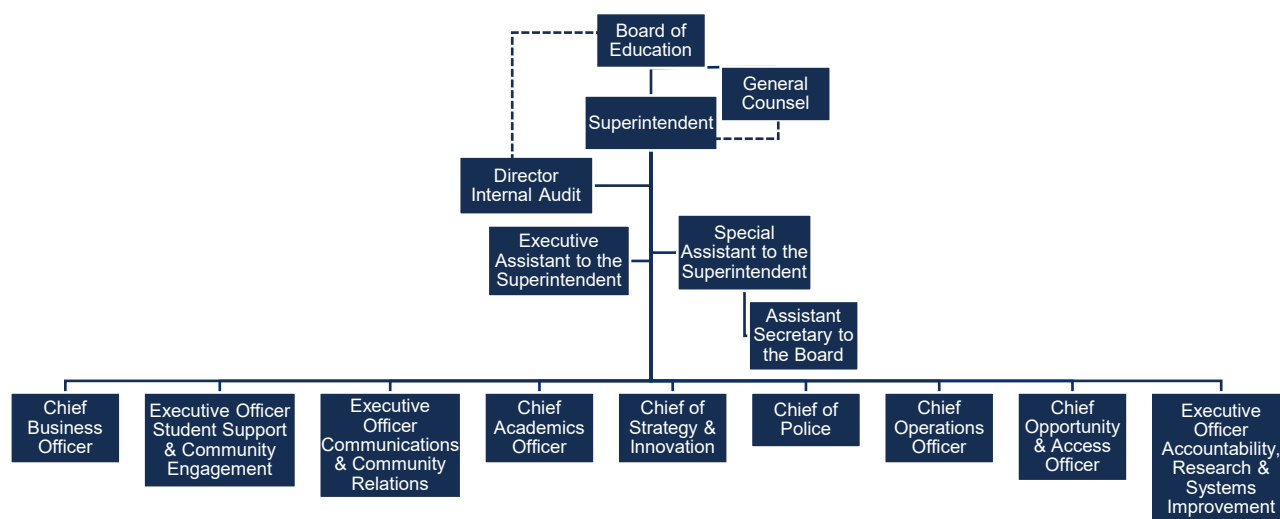
The **Schools Division** oversees and supports principals throughout the District. The departments within this division include activities and athletics, leadership and professional development, transition readiness, and school choice.¹³

The **Technology Division** ensures a secure, innovative, and accessible technological landscape throughout the District through supporting all technology from operational systems to technology used in the classroom. The information security and cyber governance, risk, and compliance (GRC) team ensures district data and systems are safe through the placement of security measures and the management of risk. The educational technology and media services team provides technology, training, and support to ensure classroom technology is innovative. The engineering and operations team ensures technology in the District runs securely and smoothly. And the support and delivery team provides technical assistance to keep technology accessible and functional throughout the District.¹⁴

In September 2024, Superintendent Marty Pollio announced his retirement effective July 1, 2025. Superintendent Pollio served JCPS as superintendent for eight years between 2017 and 2025.¹⁵ JCBE named Dr. Brian Yearwood as the next superintendent on May 29, 2025.¹⁶ The exam team met with both Superintendent Pollio and Superintendent Yearwood as part of this examination.

During the examination, Superintendent Yearwood announced plans for organizational restructuring and staffing cuts, effective July 1, 2026, for the 2026-27 school year. The new organizational chart that was approved by the Board on February 10, 2026, is shown in Figure 4.

FIGURE 4: NEW ORGANIZATIONAL CHART APPROVED FEBRUARY 2026 TO TAKE EFFECT JULY 2026



Source: Jefferson County Board of Education Work Session Meeting, February 10, 2026.

A summary of the proposed changes to the organizational structure is listed below:

¹³ “[Schools Division](https://www.jefferson.kyschools.us/page/schools-division).” Jefferson County Public Schools. Retrieved December 29, 2025.

<https://www.jefferson.kyschools.us/page/schools-division>

¹⁴ “Technology Division.” Jefferson County Public Schools. Retrieved December 29, 2025.

<https://www.jefferson.kyschools.us/page/technology-division>

¹⁵ JCPS Communications. “[Superintendent Dr. Marty Pollio Announces Retirement Effective July 1, 2025](https://www.jefferson.kyschools.us/article/1789249).” Jefferson County Public Schools. September 27, 2024. Retrieved November 10, 2025.

<https://www.jefferson.kyschools.us/article/1789249>

¹⁶ JCPS Communications. “[Yearwood Named New JCPS Superintendent](https://www.jefferson.kyschools.us/article/2242903).” Jefferson County Public Schools. May 29, 2025. Retrieved November 10, 2025. <https://www.jefferson.kyschools.us/article/2242903>

- JCPS will eliminate 648 positions, reduce 32 additional positions, and add 273 positions to the new organizational charts.¹⁷
- Finance, Information Technology, and HR are being consolidated into the Business Services Division with the Executive Officer of Finance, Executive Officer of IT, and Executive Officer of Talent all reporting to the Chief Business Officer.
- The Office of the Chief of Staff is being split into the Student Support and Community Engagement and the Strategy and Innovation Divisions.
- The Schools Division is being absorbed by Student Support & Community Engagement, Academics, and Strategy and Innovation Divisions.
- The Chief of ARSI is being replaced with an Executive Officer of ARSI.
- The Chief Communications and Community Relations officer is being replaced with an Executive Officer of Communications and Community Relations.
- The Division of Diversity, Equity and Poverty was changed to the Division of Opportunity and Access.
- Office of Exceptional Children was absorbed into the Academics Division.¹⁸

The report's analysis, observations, findings, and recommendations are primarily based on the organizational structure that was in place during the 2024-25 and 2025-26 school years. However, the organizational structure and staffing changes proposed by Superintendent Yearwood are noted throughout the report along with a narrative describing alignment with exam recommendations, where applicable.

Organization of the Report

The report is structured under the following chapters:

1. Project Background & Methodology
2. Examination Overview
3. District Leadership & Strategy
4. Jefferson County Board of Education
5. Internal Audit
6. Finance
7. Human Resources
8. Operations & Technology
9. Bus Safety
10. Student Supports, Climate, & Culture
11. Curriculum & Instruction
12. Assessments, Accountability, & Systems Improvement
13. Diversity, Equity, & Poverty
14. Exceptional Children Education
15. Multilingual Resources & Supports
16. Collect & Career Readiness
17. Appendices

¹⁷ JCPS Communications. "[Jefferson County Board of Education Votes to Approve Organizational Chart](https://www.jefferson.kyschools.us/o/jcps/article/2709641)." Jefferson County Public Schools. February 13, 2026. Retrieved February 25, 2026. <https://www.jefferson.kyschools.us/o/jcps/article/2709641>

¹⁸ "[Special Board of Education Meeting February 13, 2026](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=)." Jefferson County Board of Education. February 13, 2026. Retrieved February 25, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=>

METHODOLOGY

Our Approach

The team collected quantitative and qualitative data to inform the analysis. Data collection activities included:

1. Data and document review
2. Stakeholder interviews and focus groups
3. Stakeholder surveys
4. Comprehensive School Survey (CSS) data review
5. School visits
6. Benchmarking against peer districts
7. Laws and regulations review
8. JCPS Board of Education meetings review

Data & Documents

The team reviewed documentation and data provided by JCPS to gain a comprehensive understanding of policies, procedures, human capital, student outcomes, academic standards, and related areas. JCPS promptly fulfilled requests for data and documents. In total, over 2,000 documents were collected for review. The team also collected and reviewed publicly available documents via the JCPS website and internet research.

Stakeholder Interviews & Focus Groups

The team facilitated a series of onsite and virtual focus groups and interviews. Follow-up or clarifying interviews with leadership were conducted as needed. Primary stakeholder groups included:

- JCPS Leadership (Superintendent, Cabinet Members, Division Chiefs, Department and Team Leaders)
- JCPS Central Office Staff
- Jefferson County Board of Education (JCBE)
- JCPS Families
- JCPS Community Partners
- JCPS Advocacy Groups
- JCPS Principals
- JCPS Students

Individual interviews were held with JCPS Cabinet leadership and the Board of Education. Focus groups were held with Central Office staff in all divisions. Participants were assigned to groups based on their roles and divisions. A sample of staff representing a range of roles from each division was identified and invited by the team to participate in focus groups for Central Office.

Due to District-cited constraints regarding logistics, timing, and contract/union rules, focus groups were not offered to school-based staff apart from principals. All school-based staff were given the opportunity to participate in the exam team's survey, however. A series of seven virtual focus groups was held with 40 participating principals from across the District. Each focus group was held for a zone within the District: Elementary Zones 1, 2, and 3, Middle Schools, High Schools, Enhanced Support Schools, and Specialized Schools. A representative sample of principals was identified and invited by the exam team to participate in the focus groups.

Families, community partners, students, and advocacy groups were invited to sign up for virtual focus groups with their peers.

A summary of interview and focus group participation is provided in Figure 5:

FIGURE 5: INTERVIEW AND FOCUS GROUP SUMMARY

Interviews and Focus Groups Offered	129
Total Participants	232

Source: Special Examination Survey

Question protocols were used to conduct interviews and focus groups and included general questions asked of all participants as well as questions specific to participants' roles. The exam team took detailed notes during these discussions. With the exception of senior leaders occupying unique, individual roles (such as the Superintendent and Chief or Department heads), all data in the examination are reported in aggregate to show major themes and maintain confidentiality.

Stakeholder Surveys

The exam team conducted five surveys for central office staff, school-based staff, families, community members, and middle and high school students in JCPS. Family respondents were individuals who self-identified as having at least one student currently enrolled in JCPS while community member respondents self-identified their relationship to JCPS as "community member."

FIGURE 6: COMPLETE SURVEY RESPONSE TOTALS

Stakeholder	Number of Complete Responses	Number Invited to Participate in Survey	Percent of Stakeholder Group
Central Office Staff	591	5,613	11%
School-Based Staff	3,303	12,494	26%
Families	3,840	N/A	N/A
Community Members	452	N/A	N/A
Students (Middle & High School)	18,123	46,866	39%

Source: Special Examination Survey.

All surveys were tailored to the roles and experiences of each group and were conducted using a web-based survey tool called Alchemer. The surveys were distributed by JCPS via email. Each survey was open to its respective participants for just over three weeks, from September 3 to September 29, 2025.

These surveys contained both Likert Scale questions and open-ended questions. The Likert Scale questions included answer choices of, "Strongly Agree," "Agree," "Disagree," and "Strongly Disagree." For ease of chart visualization and reader comprehension, response data have been clustered into two categories of "Agree" and "Disagree" in figures throughout this report. The "Agree" category contains responses of "Strongly Agree" and "Agree," and the "Disagree" category contains responses of "Strongly Disagree" and "Disagree."

All surveys were offered in the top six languages spoken in the District: Arabic, English, Kinyarwanda, Nepali, Spanish, and Swahili. Participants were able to select their preferred language on the landing page.

Central Office Staff

A total of 591 Central Office staff members responded to the exam survey, yielding an 11% response rate. All divisions were represented in the sample. The majority (54%) of respondents had worked for JCPS for over 10 years. Seventy percent of respondents did not have supervisory responsibilities.

FIGURE 7: CENTRAL OFFICE STAFF SURVEY DEMOGRAPHICS

	Number of Respondents	Percent of All Respondents
Division		
Academics	54	9%
Accountability, Research, and Systems Improvement	24	4%
Administration	11	2%
Chief of Staff	29	5%
Communications and Community Relations	15	3%
Diversity, Equity, and Poverty	12	2%
Exceptional Children Education	90	15%
Finance	32	5%
General Counsel	5	1%
Human Resources	40	7%
Operations	75	13%
Other	132	22%
Schools	48	8%
Technology	24	4%
Job Category		
Non-Supervisory	413	70%
Supervisory	178	30%
Tenure		
Less than 1 year	44	7%
1-3 years	69	12%
3-5 years	55	9%
5-10 years	104	18%
10+ years	319	54%
Race/Ethnicity		
Asian	10	2%
Black or African-American	127	21%
Hispanic or Latino	21	4%
Multiracial	10	2%
Native American or Alaskan Native	10	2%
Native Hawaiian or Other Pacific Islander	1	<1%
White	327	55%
Prefer not to answer	85	14%

Source: Special Examination Survey.

School-Based Staff

A total of 3,303 school-based staff members responded to the survey, yielding a 26% response rate. Three-quarters of respondents were certified staff. Teachers made up the majority of respondents (63%). Elementary, middle, and high school levels were represented in the data with elementary school staff making up the largest percentage. Like with the Central Office staff, the majority of respondents worked at JCPS for over 10 years.

FIGURE 8: SCHOOL-BASED STAFF SURVEY DEMOGRAPHICS

	Number of Respondents	Percent of Respondents
Classification		
Certified Staff	2,464	75%
Classified Staff	839	25%
Job Category		
Administrator	259	8%
Teacher	1,951	63%
Instructional Support	395	13%
Other	489	16%
School Level		
Elementary School	1,419	43%
Middle School	753	23%
High School	1,113	34%
Tenure		
Less than 1 year	208	6%
1-3 years	406	12%
3-5 years	343	10%
5-10 years	637	19%
10+ years	1,709	52%
Race/Ethnicity		
Asian	40	1%
Black or African-American	509	15%
Hispanic or Latino	95	3%
Multiracial	48	2%
Native American or Alaskan Native	6	<1%
Native Hawaiian or Other Pacific Islander	4	<1%
White	2,166	66%
Prefer not to answer	435	13%

Source: Special Examination Survey.

Families

A total of 3,840 family members responded to the survey. Most respondents indicated they had only one student enrolled in JCPS and just over 20% of family respondents had a student with an IEP. While the majority of respondents reported English as their primary language, 10% of respondents selected Spanish and a handful selected another language.

FIGURE 9: FAMILY SURVEY DEMOGRAPHICS

	Number of Respondents	Percent of Respondents
Number of Students		
1	2,152	56%
2	1,190	31%
3	339	9%
4	91	2%
5 or more	57	1%
Students with IEPs		
Yes	798	21%
No	2,765	72%
I don't know	273	7%
Primary Language		
Arabic	28	<1%
English	3,221	84%
Kinyarwanda	9	<1%
Nepali	17	<1%
Spanish	397	10%
Swahili	9	<1%
Other	101	3%
Prefer not to answer	58	2%
Race/Ethnicity		
Asian	182	5%
Black or African-American	638	17%
Hispanic or Latino	456	12%
Multiracial	132	3%
Native American or Alaskan Native	11	<1%
Native Hawaiian or Other Pacific Islander	11	<1%
White	2,149	56%
Prefer not to answer	261	7%

Source: Special Examination Survey.

Community Members

A total of 452 community members completed the survey. The majority of respondents spoke English as their primary language, but all six of the most commonly spoken languages were represented. The three largest racial groups represented in the survey responses (Black or African American, White, and Hispanic or Latino) are reflective of the three largest racial groups in the JCPS student body.

FIGURE 10: COMMUNITY SURVEY DEMOGRAPHICS

	Number of Respondents	Percent of Respondents
Primary Language		
Arabic	10	2%
English	267	59%
Kinyarwanda	8	2%
Nepali	4	1%
Spanish	87	19%

Swahili	9	2%
Other	41	9%
Prefer not to answer	26	6%
Race/Ethnicity		
Asian	20	4%
Black or African-American	120	27%
Hispanic or Latino	92	20%
Multiracial	19	4%
Native American or Alaskan Native	8	2%
Native Hawaiian or Other Pacific Islander	5	1%
White	122	27%
Prefer not to answer	66	15%

Source: Special Examination Survey.

Students

A total of 18,123 middle and high school students responded to the survey, yielding a 39% response rate. The sample represents a wide range of primary languages, includes students with IEPs, and is relatively representative of the District's racial demographics.

FIGURE 11: STUDENT SURVEY DEMOGRAPHICS

	Number of Respondents	Percent of Respondents
School-Level		
Middle School (6-8)	8,720	48%
High School (9-12)	9,403	52%
Students with IEPs		
Yes	1,825	10%
No	11,430	63%
I don't know	4,868	27%
Primary Language		
Arabic	279	2%
English	13,420	74%
Kinyarwanda	179	1%
Nepali	239	1%
Spanish	2,475	14%
Swahili	132	<1%
Other	1,107	6%
Prefer not to answer	292	2%
Race/Ethnicity		
Asian	1,181	7%
Black or African-American	5,598	31%
Hispanic or Latino	3,102	17%
Multiracial	997	6%
Native American or Alaskan Native	83	<1%
Native Hawaiian or Other Pacific Islander	51	<1%
White	6,099	34%

	Number of Respondents	Percent of Respondents
Prefer not to answer	1,012	6%

Source: Special Examination Survey.

Comprehensive School Survey

The Comprehensive School Survey (CSS) is an annual survey that JCPS fields to collect data on the overall climate in the District from students, families, school-based staff, and non-school-based staff. JCPS has conducted this survey since the 1996-97 school year and has generated over 80,000 results each year since 2023.

When developing the exam surveys, the exam team carefully reviewed the CSS data to ensure that questions were not duplicated. When available, the team leveraged CSS data as a source of evidence in the report.¹⁹

School Visits

During the weeks of April 14 and September 15, 2025, members of the examining team visited 30 JCPS schools: 9 elementary schools, 8 middle schools, 7 high schools, and 6 special schools. This sample represents approximately 26% of the 168 total JCPS schools.

The schools selected for visits were chosen based on population, geographic location throughout Louisville, and school performance and student achievement metrics. A balanced variety of schools was sought, with a particular focus on lower-performing schools as indicated in JCPS School Profiles performance indicator scores.

FIGURE 12: SCHOOLS VISITED BY LEVEL, PERFORMANCE COLOR, AND BOARD DISTRICT

	Number of Schools Visited
School Levels	
Elementary Schools	9
Middle Schools	8
High Schools	7
Special Schools	6
School Performance Color	
Blue	2
Green	3
Yellow	2
Orange	6
Red	11
School Board District	
District 1	6
District 2	6
District 3	2
District 4	2
District 5	7
District 6	5
District 7	2

Note: Special schools did not receive an overall performance rating.

¹⁹ "JCPS Comprehensive School Survey." Jefferson County Public Schools. Retrieved March 30, 2026. <https://sites.google.com/jefferson.kyschools.us/jcps-css/home>

Figure 12 shows the breakdown of schools visited. The exam team visited special schools with a range of specialized focuses, including early childhood education, students with disabilities, credit recuperation, and Multilingual Learners.

The school visits included the following components:

- Campus tour of facilities
- Classroom visits
- Informal conversations with school staff
- Individual conversations with school principals and/or assistant principals²⁰
- Arrival or dismissal observations (when applicable)

An email communication was drafted by the exam team and sent out by JCPS Central Office to each school principal notifying him or her of the date, time, and purpose of the school visit, and asking the principal to have a list of courses being taught during the time of the visit for the exam team to select from for drop-in visits. Principals were told that they were welcome to accompany the exam team throughout, to connect them with another staff member, or to allow the exam team to proceed independently. For the majority of the school visits, the exam team was accompanied by school leadership during campus tours.

The school visits were also scheduled with consideration of school start and end times so that the exam team could observe the arrival and dismissal procedures at the school, with an eye towards student safety. In total, the team observed 15 morning arrivals or afternoon dismissals.

The exam team's observations and reflections from each school site visit were captured using a structured School Walkthrough Tool. The tool was organized into the following six sections:

- Facilities
- Arrival and Dismissal Procedures (if applicable)
- Classroom Environment
- Classroom Expectations
- Language and Respect in the Learning Environment
- Routines in the Learning Environment

Each section of the tool included a checklist series of core practices that the exam team was looking for, tied to a particular evidence-based strategy. In total, 44 classrooms were observed across 22 schools for approximately 15 minutes per class. Classrooms were observed at the six Special Schools, but the observation tool was designed for general instruction and thus was not applicable, so observations were not recorded. Qualitative data for special schools are included in **Chapter 12: Exceptional Children Education**. The exam team visited the remaining two schools at times when scheduling did not work out to observe a class due to prescheduled enrichment activities and other scheduling issues.

The exam team did not expect to observe every core practice included on the tool within each classroom in such a limited period of time. Some compelling themes emerged, nonetheless. The school visit tables included throughout the report indicate the percentage of visits in which each core practice was observed across the six aforementioned sections from the School Walkthrough Tool.

Two examiners conducted each site visit. Each examiner had his or her own School Walkthrough Tool (described in the previous section) and completed the tool independently. As the examiner conducted the site visit, he or she marked one of three options for each core practice: observed, not observed, or not applicable (N/A). Not applicable was selected only when the core practice did not apply to the site visit; for example, if arrival or dismissal was observed and the school did not have buses, all items related to buses were marked not applicable. Each exam team consolidated the completed tools into one set of observations

²⁰ Note: Assistant superintendents participated in some of these school visits and conversations.

per school. The site visit tables shown in the figures below represent one set of consolidated ratings for each school. Percentages were derived using the following equation:

$$\frac{\text{Number of schools or classrooms where this core practice was observed}}{\text{Total number of visits where this core practice was applicable}}$$

Arrival and dismissal procedures are the only area where the denominator varied slightly as certain core practices around bus procedures and student parking areas applied only to schools that had buses or student drivers. The denominators for this table range from 5 to 15. Core practices in all remaining tables were either observed or not observed so each core practice in the school facilities table uses a denominator of 30 schools and each core practice in the tables related to classroom environment and practices use a denominator of 44 classrooms.

Benchmarking Against Peer Districts

Following the recommendations of the 2014 Audit, JCPS has maintained a consistent group of peer districts to provide a stable and historical basis for comparison. The District reviewed a variety of data including number of schools, enrollment size, enrollment demographics, student-to-teacher ratio, and financials to establish the District's list of peer districts and regularly reviews the list and data to update its list as necessary. The exam team reviewed these peer districts and relevant data including enrollment, schools, student demographics, multilingual population, and annual budget to ensure that these districts were the best comparison districts for this report.

The exam team identified the following peer districts for this report:

FIGURE 13: PEER SCHOOL DISTRICTS AND STATES

DISTRICT	State
Baltimore City Public Schools	Maryland
Metropolitan Nashville Public Schools	Tennessee
Duval County Public Schools	Florida
Guilford County Schools	North Carolina
Pinellas County Schools	Florida
San Diego Unified School District	California

These districts were all on the list that JCPS provided. The exam team removed Austin Independent School District due to concerns with underperformance.²¹ The district data analyzed for this report included, but was not limited to, NAEP scores, attendance reports, staffing data, organizational structures, and board of education. Analysis comparing JCPS to other districts is included in relevant areas throughout the report.

In addition to the national peer districts, the exam team also used districts within Kentucky as comparisons when relevant. These districts included Fayette County Public Schools, Boone County Schools, and Hardin County School District. For context, JCPS is Kentucky's largest public school district, with about 96,000 students. FCPS is the second largest, serving almost 42,000 students – less than half of JCPS's population. BCS and HCSD enroll around 21,000 and 15,000 students respectively.

²¹ Lamparski, A. "[Threat of a TEA takeover looms as Austin ISD board hears consolidation plan for first time](https://cbsaustin.com/news/local/threat-of-a-tea-takeover-looms-as-austin-isd-board-hears-consolidation-plan-for-first-time)." CBS Austin. October 9, 2025. Accessed March 5, 2026. <https://cbsaustin.com/news/local/threat-of-a-tea-takeover-looms-as-austin-isd-board-hears-consolidation-plan-for-first-time>

Laws & Regulations Reviewed

The team conducted a review and analysis of the JCPS Board Policy Manual, and the state laws and regulations therein, to determine the degree of alignment with District operations, policies, and governance addressed within the scope of this examination. Additional laws and regulations were reviewed as they related to content covered in this report.

JCPS Board of Education Meetings Reviewed

The team reviewed materials related to the 23 scheduled JCBE meetings between January 28, 2025, and February 10, 2026. The review included an analysis of all linked meeting agendas, materials, minutes, and recorded livestream videos available through the Kentucky School Board Association (KSBA) public portal. The analysis was guided by a rubric that included topics related to meeting preparation, procedures, participation, use of time, and decision-making.

EXAMINATION OVERVIEW

The following chapter is a complete summary of the observations, findings, and recommendations made by the exam team throughout the report. It also includes a list of noteworthy accomplishments.

The **observations** identify areas that deserve attention or deeper review. The **findings** specify issues that require action. **Recommendations** for every observation and finding are provided to help guide JCPS towards improvements in these areas. By implementing these recommendations, JCPS can help propel Louisville's public education system to the next level of achievement.

The **noteworthy accomplishments** include examples of JCPS's positive impact, including successes, strategies, stakeholder feedback, and outcomes worthy of commendation.

CHAPTER 1: DISTRICT LEADERSHIP & STRATEGY

The exam team reviewed leadership priorities and transitions; the JCPS cabinet-level leadership structure; executive, District-level functions; and school-level leadership structures. Select policies and procedures related to JCPS leadership authorities were examined in the context of recent legislative changes. Strategic planning documents, including Goals and Guardrails and prior strategic plans, were reviewed, with recommendations offered to support alignment under a unified, updated strategic plan for the District. This section also analyzes stakeholder perceptions of District decision-making and priorities, as well as workplace culture and environment. In addition, it provides an overview of JCPS communications and community relations structures and practices, along with stakeholder perceptions of the District's communications with families and the broader community.

Noteworthy Accomplishments

- On July 1, 2026, Superintendent Yearwood plans to implement changes and reductions to his cabinet to streamline functions and consolidate the number of direct reports to the Superintendent.
- JCPS plans to develop a new strategic plan this year with updated mission, vision, goals, and metrics to guide the District's work, fulfilling a six-year gap without this direction.

Observations, Findings & Recommendations

1.1	Observation: JCPS has a more decentralized organizational structure and a higher number of superintendent direct reports compared to peer districts.
1.1.a	Recommendation: JCPS should reduce the number of direct reports to the superintendent. Ensure cabinet roles align with strategic goals.
1.2	Observation: The JCPS Chief of Staff has multiple functions that do not typically fall under a school district Chief of Staff role, such as school culture and climate, student support services, and health.
1.2.a	Recommendation: JCPS should redistribute the departments and teams that fall under the Chief of Staff to other JCPS divisions.
1.3	Observation: The new Special Assistant to the Superintendent role serves as a strategic advisor to the superintendent, rather than the Chief of Staff.
1.3.a	Recommendation: JCPS should eliminate the Chief of Staff role and continue to utilize the Special Assistant to the Superintendent role as the strategic advisor to the superintendent.

1.4	Observation: The Assistant Director for Accountability and Research role in Accountability, Research, and Systems Improvement (ARSI) division will require elimination or revision as the District moves away from Goals and Guardrails and adopts new goals and a strategic plan.
1.4.a	Recommendation: JCPS should eliminate or revise the Assistant Director for Accountability and Research role in ARSI to account for the District's shift away from Goals and Guardrails and forthcoming adoption of new goals and a strategic plan.
1.5	Observation: Leaders from special schools lacking School-Based Decision Making (SBDM) councils noted a lack of the same school-level authority afforded to schools represented by SBDMs.
1.5.a	Recommendation: JCPS administration should work with schools currently lacking SBDMs to assess the feasibility of establishing an SBDM and opportunities for increased school-level authority, decision-making, and communication.
1.6	Observation: 2022 Senate Bill 1, the Kentucky Supreme Court's 2025 decision in <i>Coleman v. Jefferson County Board of Education</i> , 2026 Senate Bill 1, and 2026 Senate Bill 4 have effectuated many changes within JCPS. Current JCPS policies and procedures are not reflective of the most up-to-date status of all these changes.
1.6.a	Recommendation: JCPS should monitor the status of the latest legislative changes and update JCPS policies, as needed, in accordance with those changes.
1.7	Finding: JCPS lacks a current, cohesive strategic plan that outlines District priorities and goals.
1.7.a	Recommendation: JCPS should develop an updated strategic plan that includes a current mission, vision, values, priorities, goals, metrics, and action steps.
1.7.b	Recommendation: JCPS should publicize the updated strategic plan and align all web and print materials to align with updated information.
1.8	Observation: A fear of retaliation exists in JCPS's workplace culture.
1.8.a	Recommendation: The JCPS administration, led by the Superintendent, should continue to foster a culture of open communication and emphasize the District's policy and stance on retaliation through relevant communication channels, including leadership messaging to staff, handbooks, and staff orientations and trainings.
1.9	Observation: Community relations activities occur across multiple divisions in JCPS. Lack of centralized community partner management may be associated with resource inefficiencies and creates a risk of failing to maintain strong relationships with partners.
1.9.a	Recommendation: JCPS should adopt a customer relationship management (CRM) system to manage community partner relations Districtwide.

CHAPTER 2: JEFFERSON COUNTY BOARD OF EDUCATION

The exam team reviewed the governance structures, roles, and practices of the Jefferson County Board of Education (JCBE), with particular attention to its oversight of District operations, financial stewardship, and policy implementation. Across the review, the exam team identified core strengths in JCBE's (further referred to as the "Board") commitment to supporting District priorities, as well as key areas where governance practices, communication, and transparency could be strengthened to ensure effective

oversight. Findings highlighted inconsistencies in Board engagement with critical District functions alongside opportunities to clarify roles, improve information flow, and strengthen decision-making processes. The accompanying observations, findings, and recommendations are intended to support the Board in enhancing governance effectiveness and ensuring alignment with best practices in public education oversight.

Noteworthy Accomplishments

- The Board has taken steps to evaluate and refine the effectiveness of its governance structures, goals, and practices, reflecting an ongoing effort to define an oversight framework that aligns with the scale, complexity, and needs of the District.
- The Board maintains a direct working relationship with District leadership, including the Superintendent and Central Office staff, enabling ongoing access to information and opportunities for engagement on key District priorities and initiatives.
- The Board has taken action on major District decisions during the exam team's review period, including approval of budgets, policies, and strategic initiatives, demonstrating its central role in District governance and its responsibility for guiding JCPS's overall direction.

Observations, Findings & Recommendations

2.1	Observation: Members of the Board expressed concerns about the District's irregular dissemination of final presentation materials prior to public meetings.
2.1.a	Recommendation: The District should develop and communicate transparent guidelines to the Board for determining which Board member questions and responses are shared publicly (e.g., through the eMeeting portal or Board documentation) and which are addressed privately.
2.2	Finding: A significant portion of Board meeting time is allocated to District-led presentations and discussions. The structure limits opportunities for Board members to engage in meaningful discussion on high-impact agenda items.
2.2.a	Recommendation: The Board should reallocate meeting time to focus more on student outcomes and less on lengthy policy discussions and presentations which can be referred to the Board Policy Committee for deeper review.
2.2.b	Recommendation: The Board should integrate student-led presentations and demonstrations of their learning into public meetings.
2.3	Finding: The Board has relied on a large consent agenda to increase meeting efficiency, which may be reducing public transparency and thorough Board review of items that impact the District's budget.
2.3.a	Recommendation: The Board should limit the consent agenda to routine items and elevate higher-impact actions for discussion on the regular agenda to strengthen transparency and Board oversight.
2.4	Observation: Stakeholders reported concerns about limited transparency and lack of input on Board decisions.
2.4.a	Recommendation: The Board should improve mechanisms for two-way communication with District families and community members, with a particular focus on ensuring meaningful engagement and timely information sharing around decision-making processes.

2.5	Observation: The Board of Education webpage on the JCPS website does not list all active Board committees or the participating members.
2.5.a	Recommendation: The District should update and actively maintain the Board of Education webpage to reflect all active committee titles, purpose, and membership.
2.6	Observation: The Board committee meeting minutes posted to the Kentucky School Boards Association (KSBA) portal are inconsistently formatted and not available for public review.
2.6.a	Recommendation: The Board and JCPS committee chairs should standardize Board committee meeting minute formatting to ensure consistency and transparency with Board business and policy making.
2.7	Finding: The rubric criteria and timeline for evaluating the new superintendent at the conclusion of the 2025–26 school year has not been communicated by the Board as of March 2026.
2.7.a	Recommendation: The Board should publicly confirm the annual evaluation criteria, process, and timeline for the District superintendent, and consult relevant stakeholders to inform the Board's annual evaluation of the superintendent.
2.8	Finding: The Board does not have a governance framework that prioritizes student outcomes because there is no current District Strategic Plan and the Goals and Guardrails framework is stalled.
2.8.a	Recommendation: The Board and superintendent should determine unified District goals to measure student outcomes and the District's overall success.
2.9	Finding: The Board has not completed a quarterly self-assessment in a scheduled public meeting since April 8, 2025.
2.9.a	Recommendation: The Board should adhere to a regularly scheduled self-evaluation and share the schedule and evaluation results publicly.

CHAPTER 3: INTERNAL AUDIT

The exam team reviewed the structure, responsibilities, and practices of the JCPS Internal Audit Department, including its staffing, reporting relationships, budget, available services, and work conducted during the examination period. The chapter examines the department's role in audits, investigations, compliance monitoring, risk assessment, audit planning, reporting, and follow-up processes, as well as its communication with the Board and the Audit and Risk Management Advisory Committee (ARMAC). It also reviews the Department's administration of complaint investigations and hotline reporting, including areas related to transparency, reporting consistency, and public access to information. The accompanying observations, findings, and recommendations are intended to support JCPS in strengthening the independence, transparency, and effectiveness of its internal audit function.

Noteworthy Accomplishments

- Internal Audit staff were the primary point of contact for APA auditors throughout the examination process. They provided requested documentation and information in a timely manner, showcasing their commitment to the improvement of the district. Additionally, Internal Audit appears receptive and eager to improve their own processes, implementing positive changes during and after the exam period of their own accord.

- The District and the Board implemented several recommendations from APA's 2014 Report. These implementations include strengthening internal audit independence and developing policies to govern internal audit activity.
- The District's decision to formalize the internal audit process for conducting risk assessments to identify and prioritize available resources, as well as to develop audit plans annually, ensures that the Superintendent, senior management, ARMAC, and the Board not only are aware of the Internal Audit Department's intentions but also have an opportunity to contribute to the prioritization.
- Internal Audit's increased use of periodic reporting to the Superintendent's Office, members of the Board, members of ARMAC, and senior management increases both an understanding of issues discovered by the department and the awareness of what the department does.

Observations, Findings, and Recommendations

3.1	Finding: The Internal Audit Director reports to three different individuals or groups: the Superintendent, the Board, and ARMAC. However, the Superintendent performs the performance evaluation for this position with limited input from the Board or ARMAC. Because the Superintendent is also the individual to whom the Internal Audit Director reports administratively and whose own performance evaluation may be adversely impacted by the work of the Internal Audit Department, the independence of the internal audit function could be compromised or appear to be compromised.
3.1.a	Recommendation: District leadership, the Board, ARMAC, and the Internal Audit Director should work together to clearly define the roles and responsibilities of each as they relate to the evaluation process for the Internal Audit Director position. In addition, the Board, or a designated Board committee such as ARMAC, should perform the annual evaluation of the Internal Audit Director, with input from the Superintendent.
3.2	Finding: The process for the Internal Audit Department to communicate responses to Board members' questions lacked transparency due to the filtering of information through one or more Chiefs prior to Board members receiving responses.
3.2.a	Recommendation: Internal Audit Department communications to the Board should not be filtered or edited by any individual. All Board questions and Internal Audit responses should be published verbatim in the Board Q&A for transparency. The Board should develop a policy to reflect this direct line of communication.
3.3	Finding: A review of ARMAC minutes during the examination period (FY23-25) found that no JCBE members attended any ARMAC meetings. While it is not required that a Board member serve as either a voting or non-voting member of ARMAC under the ARMAC charter or by written Board policy, having a Board member present for ARMAC meetings would keep the Board better informed. In the fall of 2025, a Board member was assigned to attend ARMAC meetings. The Board member's role is to attend ARMAC meetings and provide informal communication to the Board regarding ARMAC discussions and recommendations. However, the ARMAC Charter has not been updated to reflect this change.
3.3.a	Recommendation: Both the Board policy and the ARMAC Charter should be updated to require either that a designated Board member be present at all ARMAC meetings or that a member be formally assigned to ARMAC as either voting or non-voting.

3.4	Finding: Despite the ARMAC Charter requiring ARMAC to provide updates to the Board at least twice a year, there is no standardized or formalized process for ARMAC members to present updates during Board meetings, and ARMAC does not routinely report directly to the Board.
3.4.a	Recommendation: The Board, ARMAC members, District Leadership, and the Internal Audit Director should work together to formalize the process for ARMAC to report out to the full Board. This may include both the creation of standard documents or reports to be presented to the Board, as well as verbal reports from the Board member designated or assigned to ARMAC at the next Board meeting that follows an ARMAC meeting.
3.5	Finding: Two members of ARMAC have served beyond the period recommended in the ARMAC Charter.
3.5.a	Recommendation: The Board, ARMAC members, and District Leadership should consider whether the recommended length of time for consecutive membership on ARMAC should be extended or if the recommended length should be made a requirement.
3.6	Finding: Final internal audit reports (and, as later discussed, Summary Annual Engagement Follow-Up Reports) are not available publicly on a dedicated webpage. Potential benefits of public posting include demonstrating accountability and transparency to the public, building public trust in the oversight function, and potentially reducing the burden of repetitive open records requests.
3.6.a	Recommendation: Released Internal Audit reports with findings, recommendations, and responses (as well as the Internal Audit Summary Annual Engagement Follow-Up Reports) should be posted on the JCPS website and shared appropriately.
3.7	Finding: Internal Audit began producing the Quarterly Activity Report in FY 2025, but this document did not include details about findings or issues noted, nor did it include a breakdown of recommendations or type thereof.
3.7.a	Recommendation: The Internal Audit Department should continue preparing the Internal Audit Quarterly Activity Reports, but should consider including additional information, such as findings and recommendations.
3.8	Observation: While the first such report was issued after the examination period ended, cataloging corrective actions and the assessment of their implementation status in a report such as the Internal Audit Summary Annual Engagement Follow-Up Report is a step in the right direction toward transparency and holding District officials accountable.
3.8.a	Recommendation: The Internal Audit Department should continue issuing the Internal Audit Summary Annual Engagement Follow-Up Report each fiscal year, and this report should continue to be shared with members of the Board and ARMAC, in addition to the Superintendent's Office and relevant District Leadership.
3.9	Finding: Complaints received through channels other than the hotline, as well as the outcomes of complaints referred to other JCPS departments for investigation, are not included in the Quarterly Hotline Report Summary.
3.9.a	Recommendation: JCPS Internal Audit Department staff should ensure that the results of their investigations of complaints, allegations, and incidents arising outside of the hotline intake process are included within the Quarterly Hotline Report Summary.

3.9.b	Recommendation: JCPS Internal Audit Department staff should work with those assigned to investigate complaints referred to other JCPS departments to incorporate the results of that work within the Quarterly Hotline Report Summary.
3.10	Finding: Currently, the Quarterly Hotline Report Summary is provided only upon request to the Board.
3.10.a	Recommendation: JCPS should provide the Quarterly Hotline Report Summary prepared for the Superintendent to members of the Board on a routine basis
3.11	Finding: There is a need for greater visibility and public access on the JCPS website regarding the complaints process, general outcomes, and statistics, as these are currently not publicly available.
3.11.a	Recommendation: JCPS should increase the visibility of the link on the district website for reporting complaints, allegations, or incidents. JCPS should also consider periodic reminders to stakeholders about the availability of this mechanism for reporting concerns.
3.11.b	Recommendation: JCPS should consider uploading the Quarterly Hotline Report Summary to the Internal Audit Department section of the district website to enhance transparency.

CHAPTER 4: FINANCE

This chapter presents an examination of the financial operations, governance structures, and fiscal decision-making practices of JCPS, with particular emphasis on factors that contributed to the District's current financial condition. The chapter begins with an overview of finance staffing structures, internal controls, and purchasing and contracting processes, identifying areas of effective practice, as well as significant gaps in procurement compliance, contract administration, and performance oversight. The District's budgeting framework, including revenue sources, fund categories, school-level resource allocation, and strategic investment practices were also included as a part of this review. The chapter documents the development and escalation of the budget deficit since FY22, analyzing the District's reliance on fund balance and cash flow management, and examines challenges related to transparency, communication, and governance oversight by District leadership and the Board. Finally, the exam team reviewed the financial relationship between JCPS and the Jefferson County Public Education Foundation, including the management and oversight of significant philanthropic resources, and offers findings and recommendations intended to strengthen fiscal accountability, transparency, and long-term financial sustainability.

Noteworthy Accomplishments

- Finance leadership identified staff nearing retirement as a risk and took proactive steps to document Standard Operating Procedures (SOPs), particularly for highly specialized and niche roles to support continuity, cross-training, and succession planning, demonstrating effective risk management practices.
- In response to identified gaps in procurement controls, JCPS has begun taking corrective action through the adoption of formal non-competitive determination explanation required documentation.
- JCPS's use of student-weighted formulas and site-based budgeting (SBDM) councils was cited as a strength by District and school-based staff, reporting that student-weighted allocations provide meaningful supplemental resources and that schools have flexibility to tailor staffing and resource decisions to their specific contexts.
- While historically underutilized, ARMAC, whose members have deep expertise in finance, audit, and risk management, is a significant asset available to the Board for fiscal oversight and strategic risk management.

Observations, Findings & Recommendations

4.1	Observation: JCPS General Counsel training on contracting began recently in 2024–25 and is not yet required for all staff who are involved in any aspect of the contracting process, nor is it integrated with Purchasing Department procedures.
4.1.a	Recommendation: The Purchasing Department should link to or integrate the General Counsel's contracting training within the Purchasing webpage information to support streamlined communication and resources for staff around purchasing procedures.
4.1.b	Recommendation: General Counsel's office should conduct mandatory annual training for all staff who are involved in any aspect of the contracting process and track participation data.
4.2	Finding: Purchasing procedures have not been adhered to consistently, which has resulted in reported instances of vendors performing services prior to JCPS staff obtaining requisitions.
4.2.a	Recommendation: JCPS should procure and implement a robust contract management system where all purchasing documentation for every requisition can be saved and accessible in a central, digital format, and workflow processes and approvals can be documented and transparent in real-time.
4.3	Finding: In multiple instances, JCPS did not document due diligence and justification for sole source contracts meeting Kentucky Model Procurement laws related to noncompetitive negotiations.
4.3.a	Recommendation: JCPS should require a written bid from every vendor with whom the District enters a contract relationship, including sole source procurements. Written bids should provide cost detail and disclose planned use of subcontractors, when applicable.
4.3.b	Recommendation: The Purchasing Department should implement updated procurement procedures to appropriately document non-competitive negotiation conditions for sole source contracts prior to going to Board for approval.
4.3.c	Recommendation: An appropriate trained staff member, such as the Purchasing Director or General Counsel's Office, should review all non-competitive determination explanations for sole source contracts to ensure alignment with statute and procedure.
4.4	Observation: The name and format of the Data Privacy Agreement (DPA) template is confusing, as it serves as a contract that includes terms for data privacy.
4.4.a	Recommendation: JCPS should consider retitling or reorganizing of the contents of the DPA to provide clarity for users regarding its function as a contracting tool with terms for data privacy.
4.5	Finding: The District lacks processes for contract administration and performance oversight.
4.5.a	Recommendation: JCPS should develop systems and processes for contract performance oversight, indicating who will be held accountable for District spending, processes for evaluating vendor performance, and how vendor performance and contract outcomes will be reported to the Board.
4.5.b	Recommendation: JCPS should implement the planned updates to the contract administration process, including:

	• Use of metrics and KPIs in both the RFP and contract services description outlining expectations for vendors upon which their performance will be measured • Vendor costs detailed and transparent in proposal/quote and invoicing • Use of a thorough description of services in the contract • Written ethical standards and oversight expectations that contract administrators will be accountable to • Itemized invoice formatting
4.5.c	Recommendation: JCPS should update contract trainings and contract templates to include updated administration and oversight expectations.
4.5.d	Recommendation: JCPS should provide vendor performance metrics to the Board as part of the contract renewal approval process.
4.6	Finding: The cycle-based budgeting model has not been implemented at JCPS as-designed. JCPS has not incorporated data-based evidence of outcomes, effectiveness, or return on investment into overall District budget development and investment decisions.
4.6.a	Recommendation: JCPS should implement the planned changes to the cycle-based budgeting process, including an ITS system that tracks operation and investment expenditures separately, use of a proposal evaluation rubric, and ARSI support of metrics and KPI development and monitoring.
4.6.b	Recommendation: For investments, JCPS should identify and track metrics, milestones, KPIs, and goals as well as evidence of alignment to District-level goals and metrics. This data, along with funding source and amount, renewal status, and impact to budget should be transparent to the Board and the public.
4.6.c	Recommendation: As part of the budgeting process, JCPS should incorporate data-based evidence of outcomes and effectiveness, including ROI, to make investment decisions.
4.7	Finding: JCPS does not have a current strategic plan that allows for alignment of spending decisions to District priorities.
4.7.a	Recommendation: JCPS should develop budgeting priorities in alignment with an established District strategic plan.
4.8	Finding: Contingency, required by state law to maintain a balance of 2% of the District's total budget, is projected to drop to a negative balance by FY28 unless major cuts are made to the FY27 and FY28 budgets.
4.8.a	Recommendation: JCPS should bring contingency levels back to the minimum KDE-recommended levels of 5% of the total budget.
4.9	Observation: JCPS has relied on the Fund Balance to cover expenditures that exceed revenues.
4.9.a	Recommendation: JCPS should adopt a Fund Balance policy that establishes minimum thresholds to meet contingency requirements and cash flow needs, particularly during lean revenue months. The policy should include criteria for use of unassigned funds in the Fund Balance.

4.9.b	Recommendation: JCPS should examine the reason(s) for high Carryover and Carry Forward funds in the past, its impact on the Fund Balance and budget overall, and identify opportunities to more strategically spend these funds given its current financial situation.
4.10	Finding: JCPS expenditures exceeded revenues during the examination period of FY22–26, with a budget deficit that reached \$295M in FY25.
4.10.a	Recommendation: JCPS should develop and present balanced budgets to the Board in which expenditures do not exceed revenues.
4.11	Finding: The Board policy on budget control responsibility lacks specificity in roles and responsibilities and decision-making authority.
4.11.a	Recommendation: JCPS should update JCBE Policies 04.1 and 04.31 to clarify budget-related roles and responsibilities and decision-making authority.
4.12	Finding: JCPS does not have established procedures and controls related to budget roles and responsibilities and decision-making authority.
4.12.a	Recommendation: JCPS should develop specific standard operating procedures and definitions that correspond to JCBE Policies 04.1 and 04.31 and delineate the appropriate budget controls and processes for requests and approvals related to changes to the approved budget. Finance staff leaders should lead this effort and collaborate with the Internal Auditor, Superintendent, ARMAC, and members of the Board, as appropriate, in the development of these procedures.
4.13	Finding: Financial commitments were made after funding was allocated in the Draft and Tentative Budgets, resulting in added expenses within the new year Working Budget.
4.13.a	Recommendation: JCPS should continue with implementation of proposed new policy requiring budget status updates from Finance staff to the Board any time a change has been made to the adopted budget.
4.14	Finding: JCPS Finance staff faced barriers to direct communication with the Board regarding changes to the budget.
4.14.a	Recommendation: Finance staff leaders should lead all budget and finance-related presentations to the Board and should be given the opportunity to answer the Board's finance-related questions that come to the administration in writing or verbally during meetings, which should occur more regularly to cut down on the Board's information gaps. The Board should also be given updated revenue and expense projections between the September Working Budget and the May Tentative Budget. These practices should augment the efforts of the new "budget status: policy update to increase transparency to the Board and open channels of communication between Finance and staff leaders and the Board. These changes should be outlined in updated standard operating procedures.
4.15	Observation: The JCPS Superintendent and members of the Board may have been out of compliance with KRS 160.550 between the budget years reviewed of FY22–26.
4.15.a	Recommendation: The Board should update JCBE policy to explicitly align to KRS 160.550(1) that the Superintendent and Board should not recommend or vote for an expenditure in excess of income and revenue of any year, as shown by the budget adopted by the Board.

4.16	Observation: Gaps in knowledge of school finance and budgeting existed among District leaders and JCBE members, resulting in a variable range of understanding of short- and long-term implications of JCPS fiscal decision-making and budgeting.
4.16.a	Recommendation: The Board should pursue school finance training beyond the required schedule and participants mandated by Kentucky state law.
4.17	Finding: ARMAC is a strong committee with extensive expertise that is an underutilized resource to the Board to advise on risk management processes and fiscal oversight. The Board has not had regular ARMAC report-outs at Board meetings and only recently established a formal Board member liaison role to the committee.
4.17.a	Recommendation: Board members should communicate regularly with Internal Audit
4.17.b	Recommendation: The Board should continue to use ARMAC in its advising capacity as a committee to the Board on key risk management processes, including the District budget process.
4.17.c	Recommendation: JCPS staff, in coordination with ARMAC and the Board, should update the ARMAC charter to explicitly include budget process as a standing annual focus area.
4.17.d	Recommendation: JCPS staff, in coordination with ARMAC and the Board, should align ARMAC meeting cadence and Board presentations to align with budget cycle milestones, allowing ample opportunity for review and advising support to the Board related to budget process.
4.17.e	Recommendation: The Board should leverage the new Board member ARMAC liaison role as a communications channel between the committee and the Board.
4.18	Finding: JCPS financial reporting documents and presentations are comprehensive but lack consistency and ease-of-understanding for the Board and a broad audience.
4.18.a	Recommendation: JCPS financial reporting documents and presentations should be updated to include consistent, defined terminology and budget categories while maintaining KDE compliance.
4.18.b	Recommendation: JCPS administration should provide regular reporting to the Board of real-time cash flow showing actual expenditures and revenues against budgeted amounts.
4.19	Observation: There are gaps in information and a lack of transparency regarding roles, decision-making, and financials between JCPS, JCBE, and JCPEF.
4.19.a	Recommendation: JCPS and JCPEF should collaborate to define a set of clear, written roles and responsibilities for JCPS staff, JCPEF staff and Board members, and JCBE members as it relates to funding strategy, fund management, and decision-making authority. This role definition process should be thoughtful about checks and balances, transparency, and clear lines of communication between members of these organizations and with the public (including potential donors).
4.19.b	Recommendation: JCPS and JCPEF should collaborate on opportunities to increase transparency and publicly available information related to strategy, impact, and financials.

4.19.c	Recommendation: JCPS and JPEF should collaborate to define an updated, long-range plan for the invested MacKenzie Scott (endowment) funds that were not allocated for specific purposes in the original MOU. • This plan should clearly communicate how spending plans align with District strategic goals and priorities and should include a recurring review cycle for JCPS administration to report out to JCPEF and JCBE on how those funds have been spent, related student outcomes, and other KPIs • In coordination with this review cycle, JCPEF should report financial data related to endowment balance • This plan should include financial projections conducted by a financial advisor that shows the expected annual returns on the invested funds to help JCPEF and JCPS make informed spending decisions based on how much money will be available in the future

CHAPTER 5: HUMAN RESOURCES

The exam team reviewed the District's human resources (HR) functions, including talent recruitment, hiring, onboarding, workforce planning, and retention strategies, as well as the systems and structures that support these efforts. The exam team's review identified foundational processes and structures in place to manage a large and complex workforce, alongside variability in implementation and opportunities to strengthen alignment, efficiency, and data-driven decision-making. Findings highlighted gaps in consistent HR practices, clarity of roles and responsibilities, and the use of workforce data to inform strategic talent decisions. The accompanying observations, findings, and recommendations are intended to support JCPS in strengthening its human capital systems to better recruit, develop, and retain a high-quality workforce aligned to District priorities.

Noteworthy Accomplishments

- The District has established centralized HR structures and processes to support recruitment, hiring, and onboarding across a large and complex workforce, providing a foundational framework for managing Districtwide talent operations.
- The District has implemented Districtwide recruitment processes and centralized supports to attract and hire candidates, creating a more coordinated approach to staffing across schools while managing the scale of district hiring needs.
- The District has taken steps to collect and analyze workforce-related data, providing an initial foundation for informing staffing decisions and identifying trends related to recruitment, retention, and workforce composition.

Observations, Findings & Recommendations

5.1	Observation: The District must continue its efforts to reduce its teacher shortage.
5.1.a	Recommendation: The District's Recruitment Department should continue employing targeted efforts to reduce teacher vacancies.
5.2	Finding: The District continues to experience shortages and vacancies in classified positions, which affect operations at both the school and district levels.
5.2.a	Recommendation: The District should review classified job duties and pay to address ongoing shortages.
5.3	Finding: The District does not have a formal procedure for auditing, updating, and posting all job descriptions to the public portal.

5.3.a	Recommendation: The District should establish a clear process and schedule for regularly reviewing and updating job descriptions. HR should verify all job titles and duties reflect the actual functions being performed, reporting lines are consistent with the reorganization, and update as necessary.
5.4	Finding: Hiring managers report inconsistent levels of service delivery and support from HR teams with site-based hiring procedures and timelines across the District throughout the year, resulting in delays and inconsistency in finding qualified candidates for open positions.
5.4.a	Recommendation: JCPS leadership should work with JCTA to address the annual timing for the District's hiring windows to ensure maximum staffing efficiency and effectiveness.
5.4.b	Recommendation: The Personnel Services Department should implement policies and procedures consistently across all assigned zones, ensuring fair support for hiring managers and employees.
5.4.c	Recommendation: HR must ensure that candidates who do not meet minimum qualifications or who are disqualified through required pre-employment screening are promptly removed from the hiring process and are not advanced to an offer stage until all required clearances are confirmed and documented.
5.4.d	Recommendation: HR should review zone-based staffing assignments during busy hiring periods to maintain steady service for site-based hiring managers and prevent delays due to processing.
5.4.e	Recommendation: The District should assess ATS access levels for hiring manager assistants to prepare for site interviews.
5.5	Observation: Although the District does not have a Board policy specifying participation requirements for the New Teacher Induction Program, its program complies with KRS 161.031.
5.5.a	Recommendation: The Board should develop a formal new teacher induction and mentor program policy to ensure consistent implementation and participation across schools within the district.
5.6	Observation: The District's lack of comprehensive staff retention data limits HR's ability to analyze trends, identify root causes, and implement effective retention strategies for all role types in the district.
5.6.a	Recommendation: The District should further invest in biannual classified staff retention surveys to better track trends and inform retention efforts.
5.6.b	Recommendation: HR should revise the District's exit survey for all employees to include targeted questions about why employees leave, making the data useful for retention.
5.7	Finding: The District utilizes a paper-based evaluation system for approximately 18,000 employees, which significantly affects integrated processes related to data collection, entry, and annual on-site storage.
5.7.a	Recommendation: The District should procure and implement a comprehensive electronic performance management system to streamline employee evaluation procedures districtwide.

5.8	Finding: The District does not have a standardized policy for funding stipends to teachers whose classroom enrollment exceeds the student limits set in school-based budgets.
5.8.a	Recommendation: The District should study the underlying challenges and costs associated with compensating teachers for overage pay when class sizes exceed established caps and determine whether the development of a formal District policy or procedural change could improve cost efficiency and promote greater consistency in class size management.
5.9	Finding: Despite a 62% inflation-adjusted increase in per-student revenue from 2002 to 2022, average teacher salaries in JCPS increased by only 12%, contributing to stagnant purchasing power and salary growth that has not kept pace with the cost of living.
5.9.a	Recommendation: The District should conduct a comprehensive teacher salary analysis and implement targeted increases to starting teacher salaries to ensure they remain competitive with state and national benchmarks.
5.10	Observation: JCPS has the highest ratio of school administrators per student among districts with similar student enrollment numbers.
5.10.a	Recommendation: The District should review administrator staffing ratios and base salaries to ensure they match student needs, school size, and organizational complexity, using state and national benchmarks for comparison. Targeted adjustments may be necessary to improve school outcomes and financial sustainability based on assessment results.

CHAPTER 6: OPERATIONS & TECHNOLOGY

The exam team reviewed and identified the structure, staffing, and key challenges within the Operations Division and the Technology Division. The exam team also reviewed School and Community Nutrition Services (502 Food Works) and examined Technology Division organization and staffing, sustainability of ESSER-funded initiatives (including Chromebook repair and replacement), technology strategy and data governance, network and infrastructure modernization, application and data services, cybersecurity and AI readiness, and technology support services. It summarizes findings and recommendations related to operations reporting relationships and workforce vacancies; facilities planning, transparency, and capital decision-making through tools such as the Facility Profile Index (FPI), District Facility Plan (DFP), and Comprehensive District Improvement Plan (CDIP); deferred maintenance, building age, and enrollment-to-capacity trends; and observations from school site visits and stakeholder perceptions of facility conditions.

Noteworthy Accomplishments

- JCPS's Operations Division successfully supports a large workforce of 1,665 staff and manages a wide range of essential services that keep schools functioning safely and smoothly, including transportation, nutrition, facilities, and Geographic Information System (GIS)/performance operations.
- JCPS has made progress in facilities planning transparency through the introduction of the Facility Profile Index (FPI) in 2025, which helps to serve as a documented, data-driven foundation for capital planning.
- JCPS has taken a careful and intentional approach to emerging technologies, particularly AI, through the development of a Generative AI Implementation Guide and governance structure to support policy and decision-making around the use of AI.

Observations, Findings & Recommendations

6.1	Observation: The reporting relationship between the Executive Director for Facility Maintenance, Renovations, and Property Management Services and the Executive Director for Operations Services differs in practice from what is written in the organizational chart.
6.1.a	Recommendation: The JCPS Operations Division should clarify the reporting relationship between the Executive Director for Facility Maintenance, Renovations, and Property Management Services and the Executive Director for Operations Services.
6.2	Observation: JCPS's facility plan documents are not clearly aligned.
6.2.a	Recommendation: The JCPS Facilities Profile Index (FPI) should explicitly connect with the District Facility Plan (DFP), using common metrics, definitions, and aligned facilities improvement plans for clarity and transparency.
6.3	Observation: The 2025 Facility Profile Index provides data related to future investment decisions, increasing public transparency. Prior to 2025, it is unclear to the public and to the exam team what data were used to inform capital planning and how decisions were made regarding capital resource allocations.
6.3.a	Recommendation: JCPS should include information on recently completed and ongoing capital improvement projects by school and zip code in the annual Facilities Profiles Index (FPI) report for context, so public perception is not inaccurately skewed, and to further strengthen accountability to stakeholders regarding facilities decision-making.
6.3.b	Recommendation: JCPS should ensure capital improvement plans and decisions regarding school closures, consolidations, and relocations align with the published data and recommendations in the FPI report.
6.4	Observation: JCPS lacks a transparent deferred-maintenance master plan to manage the backlog of maintenance needs postponed due to budget constraints.
6.4.a	Recommendation: JCPS should develop a master deferred maintenance plan that prioritizes transparency in repairs, estimated costs, and funding strategy.
6.5	Observation: School building age varies widely by Board District.
6.5.a	Recommendation: JCPS should disaggregate the FPI analysis of planned facility changes by geographic area (such as Board District or zip code). The Board District analysis should be included in the annual FPI report to improve stakeholder transparency.
6.5.b	Recommendation: JCPS should include school building location as part of facility decision-making process, using building age as one indicator in addition to condition assessments, maintenance history, and documented repair needs, particularly in Board Districts with disproportionately older buildings.
6.6	Finding: More than a quarter of schools are under-enrolled, representing an opportunity for consolidation and cost savings in capital infrastructure and maintenance.
6.6.a	Recommendation: JCPS should continue existing efforts to flag under-enrolled schools for potential consolidation or boundary changes to maximize efficiency and cost savings. JCPS should monitor class size changes associated with any consolidation or boundary changes.

6.6.b	Recommendation: JCPS should analyze schools on the cusp of the optimal capacity boundaries to further identify areas for resource optimization.
6.7	Observation: JCPS lacks a funded, sustainable, repair-and-replacement cycle for aging Chromebooks originally purchased with ESSER funds, which may impact the District's ability to maintain 1:1 device access for students.
6.7.a	Recommendation: JCPS should develop a funded Chromebook repair-and-replacement cycle to sustain 1:1 devices for students, assuming the further analysis recommended in this report about the efficacy of Chromebook use on academic achievement and career readiness yields positive results.
6.8	Observation: The 2025-26 Technology Division restructuring and Technology Plan reflected JCPS leadership's intentional alignment with KDE regarding Educational Technology and Media Services under the Technology Division. The forthcoming organizational structure changes in the 2026-27 school year impact that alignment.
6.8.a	Recommendation: Technology staff leaders should make updates, as needed, to their forthcoming District Technology Plan that reflects the 2026-27 changes to the organizational structure and District strategies and goals. The Technology Plan should address the move of Education Technology and Media Services back to Academics and how this move supports District technology strategy in alignment with the KETS Master Plan.
6.8.b	Recommendation: JCPS should consult industry research and best practices for technology use in school districts to help inform JCPS's approach to using Chromebook devices, instructional technologies, and AI, in alignment with District strategy and goals, particularly in areas of student learning and instruction.
6.9	Observation: JCPS lacks a data governance framework to provide strategy and informed decision-making regarding roles, rules, processes, and resources that relate to District data and systems.
6.9.a	Recommendation: JCPS should develop and document a data governance framework of policies, procedures, and roles regarding District data, including but not limited to, student, staff, and financial data in Infinite Campus and MUNIS.
6.10	Observation: Low usage of teacher, parent, and student communications software by parents and students shows a need for a concerted effort on JCPS's part to create better engagement.
6.10.a	Recommendation: JCPS should analyze the reasons behind low parent and student use of teacher, parent, and student communication software to inform an action plan for creating better engagement.
6.11	Observation: JCPS's payroll process is inefficient and could lead to errors.
6.11.a	Recommendation: JCPS should reevaluate its payroll process to determine what technological updates are needed to make that process more efficient and less risky.
6.12	Observation: Staff reported the District has taken a cautious approach to AI implementation, with a commitment to safety and gradual integration of new technologies.

6.12.a	Recommendation: JCPS should consult industry research and best practices for AI use in school districts to help inform the District's approach to incorporating AI into learning and instruction.
6.12.b	Recommendation: JCPS should develop systems for assessing impact of AI use by staff and students to understand the role it plays in student learning, instruction, and achieving District goals.
6.13	Finding: JCPS does not have a formal review process in place to ensure IT policies and procedures are up-to-date.
6.13.a	Recommendation: JCPS should develop a formal review process to ensure at least an annual review of its IT policies and procedures to ensure compliance with the best, up-to-date practices.
6.14	Finding: JCPS gives local administrator rights to too many employees.
6.14.a	Recommendation: JCPS should reduce the number of individuals given local administrator rights to ensure that only those that truly need such access are given it.

CHAPTER 7: BUS SAFETY

The exam team reviewed the structure, responsibilities, and practices of JCPS's transportation function as they relate to bus safety, including staffing, operations, contracting, recruitment and retention efforts, student behavior management, and transportation-related incidents during the examination period. The chapter examines the district's transportation operations, key events affecting bus service, and the decisions and conditions that contributed to service disruptions, as well as the district's response through external reviews, corrective actions, and operational changes. It also reviews bus driver recruitment and compensation strategies, student behavior incidents and referral processes, survey data related to safety perceptions, and relevant policies, procedures, and prior recommendations concerning student conduct and transportation safety. The accompanying observations, findings, and recommendations are intended to support JCPS in strengthening the safety, reliability, and effectiveness of its transportation services.

Noteworthy Accomplishments

- During school site visits, several school leaders shared that while transportation was a persistent challenge in the 2023-24 school year, it has since become much more reliable and on time. As such, JCPS has made several positive changes in response to the August 2023 busing incident.
- JCPS now has a fully developed centralized routing team consisting of a routing supervisor, two lead routers, five specialist routers, and administrative support.
- JCPS has made efforts to maximize driver retention and recruitment, and increased bus driver numbers by adding 167 new bus drivers between July 1, 2024, and August 1, 2025.
- Operations drafted an administrative procedure passed by the Board in May 2025 that imposes stricter criteria on Legacy Enrollment, previously referred to as "Grandfathered Transfer," which applies when an address is rezoned and a student has not moved their residence. The policy allows continued enrollment at the student's current school for one school year rather than being rezoned to another school; however, Legacy Enrollment is available only to students who meet specific criteria.

Observations, Findings & Recommendations

7.1	Finding: The contract with AlphaRoute was not properly evaluated and documented as to the justification behind its eligibility for non-competitive procurement.

7.1.a	Recommendation: JCPS should complete the Non-Competitive Negotiation Determination and Finding form for all applicable procurements and follow up on references. In addition, justification for this approach should be written for JCPS, not the vendor, and should provide detailed, acceptable justification for using this approach.
7.2	Finding: The planning and implementation of three separate, multi-focused initiatives on the same day without input from all effected stakeholders contributed to the transportation issues that occurred on opening day in 2023.
7.2.a	Recommendation: JCPS should strive to make implementation of new initiatives inclusive for all stakeholders. Early involvement by all parties may decrease the likelihood of future incidents.
7.3	Finding: Although exit surveys were sent to bus drivers via electronic link and a reminder on the official resignation notification of change form, JCPS does not have the responses. Additionally, exit surveys are not required.
7.3.a	Recommendation: JCPS should consider making exit surveys mandatory and using the feedback to identify trends in employee turnover, provide training where needed, and take other steps to prevent future employee departures.
7.4	Finding: Survey data at the per-school level reflected a concerning level of fear among students who ride the bus to school.
7.4.a	Recommendation: JCPS should conduct more detailed and targeted analyses of the contributing factors to student fears about bus riding safety where per-school survey responses showed greater levels of fear.
7.5	Finding: For 2022-23 and 2024-25, 33,358 out of 42,712 behavior incidents on a bus were committed by repeat offenders, indicating JCPS's disciplinary policies and processes for bus incidents and referrals are not effective.
7.5.a	Recommendation: JCPS should review its disciplinary policies and processes for bus incidents and referrals to ensure they are effective and enforced to the extent necessary. Bus safety should be a top priority for the district, and any policy or process related thereto should be consistently and thoroughly applied.

CHAPTER 8: STUDENT SUPPORTS, CLIMATE & CULTURE

This chapter examines JCPS's approach to supporting student well-being. The exam team reviewed the factors that impact students' ability to learn along with the resources, programs, and plans that the District has in place to support students. Identified supports include specialized staffing, support services, family engagement efforts, and community partnerships. The exam team reviewed the student supports within the District, including mental and behavioral staffing along with both academic and non-academic services provided. The exam team also explored school culture and climate within the District, the District's attendance and chronic absenteeism efforts, and its extracurricular activities and athletics. This chapter also examines school safety across the District, including student behavior and discipline data provided by the Jefferson County Public Schools Police Department.

Noteworthy Accomplishments

- In the 2024-25 school year, JCPS met the recommended student-to-school counselor ratio, with one counselor per 204 students. Compared to peer districts, JCPS saw the lowest ratio and was the only district to meet the recommended ratio (1:250). This effort was reflected in the exam team survey, with almost 90% of students agreeing that they "have access to necessary mental health resources, like counseling."

- JCPS conducts an annual comprehensive school survey (CSS) to collect data on overall climate in the District. Since 2023, the survey has yielded over 80,000 responses, and, in 2026, the survey was completed by 99% of certified staff, 85% of classified staff, and 83% of students. These response rates allow the District to receive a representative understanding of school and workplace climate.
- JCPS's four-year graduation rate has steadily increased by seven percentage points since 2019, reaching 89% in 2025. These gains may be attributable, in part, to the range of dropout prevention supports offered by JCPS to help students overcome barriers that may delay or prevent graduation.

Observations, Findings & Recommendations

8.1	Observation: JCPS currently exceeds national recommendations for student-to-school counselor ratios but falls short of national recommendations for student-to-school psychologist ratios. This difference may reflect how JCPS has structured its student support staffing model.
8.1a	Recommendation: JCPS should continue to monitor its student supports staffing model to ensure that students' mental and behavioral needs are met.
8.2	Observation: Families and JCPS staff believe the District is insufficiently staffed and resourced to meet student needs.
8.2.a	Recommendation: JCPS should analyze student support staffing levels in relation to vacancies, available funding, and staff and family perceptions to plan for future hiring needs in this area.
8.3	Finding: Knowledge of JCPS tutoring programs by key leadership was incomplete and disjointed, as multiple interviews across different divisions were required to obtain a full scope of JCPS's tutoring programs and contracts. JCPS has not placed the responsibility of administering and monitoring third-party tutoring programs within a singular division. Instead, these programs are administered by various divisions or individuals. Such disbursement of responsibility increases the difficulty by which programs can be administered, monitored, and evaluated in a consistent manner.
8.3.a	Recommendation: JCPS should consider either placing all responsibilities regarding third-party and JCPS-sponsored tutoring programs within a single division or implementing consistent administration, monitoring, and evaluation methods across all programs.
8.4	Finding: There is no documented and intentional process or procedure by JCPS to advertise the various tutoring programs offered to students, other than relying on word-of-mouth from classroom teachers. In addition, JCPS's website does not list all available tutoring services and still lists third-party tutoring vendors for which JCPS no longer has active contracts, including one that is no longer in business.
8.4.a	Recommendation: JCPS should develop an accessible system to advertise the various tutoring programs available to students, in addition to sharing the information through current communication channels. JCPS should also regularly update its website so current information about tutoring options available in the district is shared with students and their families.
8.5	Finding: Contracts and other agreements with the third-party tutoring providers do not require the provision of student performance metrics regarding the use of each program. In addition, JCPS does not appear to be tracking or collecting performance data across the district and has not established a set rubric for scoring the outcomes and quality of third-party tutoring resource usage.

8.5.a	Recommendation: JCPS staff who administer and monitor these tutoring programs should work together to develop a rubric to score the quality of outcomes for each program and a clear, standardized measurement tool to aid in assessing the value of each program. Staff assigned to these tasks should also conduct periodic cost-benefit analyses to determine if contracts and agreements should be extended beyond the initial period.
8.6	Observation: Not all School-Based Decision Making Councils are in compliance with KRS 160.345.
8.6.a	Recommendation: JCPS should ensure all SBDMs meet the required parent participation guidelines. Review membership data for SBDMs to see which schools struggle to attract parent representatives and meet with principals to develop recruitment strategies.
8.7	Observation: JCPS does not use robust data collection, analysis, or reporting of outcomes for students served through the Community Support Services programs.
8.7.a	Recommendation: JCPS should develop robust data practices for improved tracking and public reporting of outcomes data and impact for all Community Support Services programs administered with partner organizations.
8.8	Observation: In the first year of the cell phone policy, stakeholders had mixed opinions on the consistency of implementation across schools and student accessibility.
8.8.a	Recommendation: JCPS should annually assess stakeholder perceptions of the cell phone policy and its impact to help inform related policies, procedures, and communication with schools. JCPS should also review student outcomes data through a pre- and post-cell phone policy lens to understand any changes or trends.
8.9	Finding: JCPS had lower attendance and higher chronic absenteeism than the state average in the 2024-25 school year.
8.9.a	Recommendation: JCPS should assess which interventions have helped improve chronic absenteeism rates in recent years and leverage these practices to close gaps.
8.10	Observation: JCPS tracks high-level dropout prevention and re-engagement effectiveness, but it is unclear the extent to which it tracks the effectiveness of individual interventions and supports.
8.10.a	Recommendation: JCPS should continue practices that have contributed to the steady increase in graduation rates across most demographic groups and ensure interventions and supports target Hispanic students, who have seen declines in graduation rates.
8.11	Observation: One-fifth of all JCPS students reported feeling “unsafe” at school, according to the exam team’s survey.
8.11.a	Recommendation: JCPS should explore in greater detail why one-fifth of its students feel unsafe and work to remedy that issue, since there does not appear to be a correlation between school behavior incidents and feeling unsafe.
8.12	Finding: JCPS has not allocated adequate funding or school-level staffing resources to ensure the effective implementation and ongoing maintenance of the weapons detection systems.

8.12.a	Recommendation: JCPS should allocate additional resources to schools to properly staff weapons detection systems and establish a long-term plan for sustainability of both the equipment and implementation practices.
8.12.b	Recommendation: JCPS should conduct an analysis on the use of mobile detection equipment at after-school events to assess cost, wear and tear on machines, and whether all schools have access to a mobile unit.
8.13	Finding: Behavior and discipline events vary across both schools and student subgroups, with African American students and Students with Disabilities disproportionately experiencing behavior events.
8.13.a	Recommendation: JCPS should establish a quarterly discipline review process that analyzes behavior event rates and resolutions by school, grade level, incident type, and student subgroup and investigate drivers of disproportionality. JCPS should publicly report progress toward reducing risk ratio gaps over time.
8.14	Finding: JCPS Police Department (JCPD) may have disproportionately charged (cited or arrested) Black or African American students in the 2024-25 school year.
8.14.a	Recommendation: JCPS should continue to hold monthly meetings to analyze the underlying causes and trends related to possible disproportionate citations within the District. Specifically, JCPD should review charges by discipline event, race, and punishment. These sessions should involve all key District leaders, including, at a minimum, representatives from JCPD, ARSI, Culture and Climate Department, and the Schools Division. Along with District-level meetings, JCPD should also organize meetings at the school level to identify root causes and patterns of citation disproportionality at individual schools.

CHAPTER 9: CURRICULUM & INSTRUCTION

The exam team analyzed JCPS's curriculum and instruction functions, including academic vision and strategy, high-quality instructional resources (HQIRs), Multi-Tiered Systems of Support (MTSS), classroom instruction, and the Journey to Success framework. The exam team reviewed the work of the Academics and Schools Divisions, which are primarily responsible for supporting instructional quality and school performance across the District. The Academics Division focuses on curriculum implementation, professional learning, instructional programming, and content-specific support for teachers and instructional leaders, while the Schools Division is responsible for supervising principals and supporting school-level implementation. The chapter also examines how these two divisions coordinate with one another and with other Central Office teams to provide instructional support to schools.

Noteworthy Accomplishments

- By adopting Districtwide HQIRs following state policy changes, JCPS has increased consistency of instruction across the District and strengthened the Central Office's ability to provide targeted professional learning and walkthrough feedback.
- According to survey data, a strong majority of school-based staff reported access to appropriate instructional materials, and most students and families perceived coursework as appropriately challenging, relevant, and reflective of their communities.
- Exam team school visits and student survey data indicated that most classrooms demonstrate respectful interactions, age-appropriate language, and cooperative routines that support student safety and productivity.

Observations, Findings & Recommendations

9.1	Observation: Following the 2025 superintendent transition, the District's messaging on academic goals changed; however, there is no evidence that the updated message was systematically communicated to the Board, principals, or the broader community.
9.1.a	Recommendation: The Board, in coordination with JCPS administration and its strategic planning efforts, should determine the role of the Goals and Guardrails as it relates to student outcomes.
9.1.b	Recommendation: JCPS should ensure that any future strategic plan establishes clear academic goals and that measures of success are communicated transparently and consistently with the public, Board, and school-based staff. If new goals and measures of success are adopted, these should be adopted as soon as possible.
9.2	Finding: JCPS leadership, Central Office staff, and school principals reported a need for increased collaboration between Central Office divisions that provide support and guidance to schools.
9.2.a	Recommendation: JCPS should consistently use collaboration structures to go beyond division leadership and zone-level meetings. More staff (beyond leadership) should be included in collaboration efforts.
9.2.b	Recommendation: JCPS should develop and implement a shared, cross-division tracking system to coordinate Central Office communication, requests, school visits, and reporting requirements. The system should allow divisions to view and align supports being provided to each school, prioritize assistance based on need, reduce duplicative requests, and ensure schools receive timely, actionable feedback following walkthroughs.
9.3	Observation: JCPS's current organizational structure includes four chiefs reporting directly to the superintendent, each overseeing curriculum and instruction functions. This is notably higher than most peer districts. The expanded number of leadership roles in JCPS presents challenges for consistency and collaboration in supporting schools.
9.3.a	Recommendation: JCPS should continue with its current plan to reduce the number of cabinet-level positions that lead curriculum and instruction functions for the District.
9.4	Observation: Teachers are not consistently leveraging HQIR materials and assessment information to provide differentiated small-group instruction to address a range of student needs.
9.4.a	Recommendation: JCPS should strengthen HQIR implementation supports by providing clearer guidance and coaching to help teachers differentiate lessons to meet students' needs. This includes showing teachers what effective small-group instruction looks like, how to use student information to group students, and how to plan extra support for students who need it. JCPS should also ensure that teachers receive regular feedback on both whole-group lesson delivery and differentiated instruction.
9.5	Finding: One in four teachers observed by the exam team did not demonstrate high expectations for students. School-based respondents on the staff survey reported similar perceptions; 25% did not agree that JCPS students were held to high expectations.
9.5.a	Recommendation: JCPS should, where needed, provide coaching and support that equips teachers to set and maintain high expectations for all students, particularly in classrooms serving diverse learners, including multilingual learners and students with disabilities.

9.6	Finding: Based on exam team school visits, classroom instruction in many observed settings was marked by limited student engagement, reliance on basic recall-level activities, and superficial use of curriculum materials. Few lessons demonstrated deep conceptual understanding or critical thinking, and some teachers appeared uncertain or lacked clarity regarding curriculum content.
9.6.a	Recommendation: JCPS should enhance its professional development and coaching offerings to increase student engagement, promote deeper conceptual understanding, and foster critical thinking in classroom instruction. This support should include strategies for effective use of curriculum materials, lesson planning that moves beyond recall-level activities, and ongoing opportunities for teachers to build confidence and clarity in HQIR content.
9.7	Finding: The exam team observed frequent use of Chromebooks (e.g., laptops) for instructional purposes during school visits. This usage did not appear to support high-quality instruction or student engagement.
9.7.a	Recommendation: JCPS should establish and implement clear expectations and supports for effective instructional technology use, including guidance on when and how Chromebooks should be used to advance rigorous, standards-aligned instruction and active student engagement.
9.8	Finding: Learning environment indicators from the exam team's school visits illustrate that while many classrooms demonstrated a generally respectful and orderly climate, students were not consistently positioned to lead or sustain academic discourse with their peers. Classroom routines and norms were not consistently leveraged to promote student agency and peer-to-peer discourse.
9.8.a	Recommendation: JCPS should strengthen Tier 1 instructional expectations and coaching to increase student-led academic discourse and peer-to-peer collaboration (e.g., structured academic talk routines, discussion protocols, and student roles that require students to explain thinking, ask questions, and respond to peers), supported by consistent classroom norms and routines that build student agency (e.g., independent use of classroom resources, peer support to complete tasks, proactive and respectful behavior management, and regular opportunities for student reflection).

CHAPTER 10: ASSESSMENT, ACCOUNTABILITY & SYSTEMS IMPROVEMENT

The exam team reviewed JCPS's assessment, accountability, and systems improvement functions. The review included the District's assessment system, use of student performance data, and school accountability framework. The team examined the work of the Accountability, Research, and Systems Improvement (ARSI) Division, which oversees assessments, data analysis and reporting, accountability, and continuous improvement. Coordination with the Schools, Academics, and Exceptional Children Education Divisions was also reviewed. State and federal accountability requirements and related District policies were examined to understand how schools are identified for support and improvement. This chapter analyzes how data are used to inform District- and school-level decision-making, evaluates progress monitoring systems, and examines the District's approach to supporting federally designated schools.

Noteworthy Accomplishments

- By opting into the Trial Urban District Assessment (TUDA), JCPS has access to nationally comparable National Assessment of Educational Progress (NAEP) data, enabling the District to benchmark student performance against peer districts and national trends and strengthen transparency and credibility in reporting student outcomes.
- The District administers a comprehensive and balanced assessment system that includes formative, interim, and summative measures across grade levels, supporting compliance with state

and federal requirements while also providing actionable data to inform instruction and progress monitoring.

Observations, Findings & Recommendations

10.1	Finding: JCPS has experienced a sharper and more sustained decline in NAEP proficiency rates since the COVID-19 pandemic than many of its peer districts, particularly in fourth-grade Reading and eighth-grade Mathematics and Reading.
10.1.a	Recommendation: JCPS should use its new strategic plan to prioritize targeted supports in the grade levels and subject areas with the most sustained post-pandemic declines, with particular emphasis on strengthening core instruction, targeting intervention for below-proficient students, and providing professional learning/coaching to support teachers' delivery of differentiated interventions. An intentional districtwide strategy will ensure that time, staffing, and instructional resources are aligned to the areas of greatest need.
10.2	Finding: Kentucky Summative Assessment results indicate that significant gaps remain across multiple student groups within JCPS. While some JCPS subgroups perform closer to the District average than to the statewide average, the data demonstrate that achievement gaps persist and require JCPS's continued attention.
10.2.a	Recommendation: JCPS should use Kentucky Summative Assessment results to set clear, measurable subgroup targets for proficiency within the next iteration of its strategic plan.
10.3	Finding: According to the 2024-25 Kentucky Accountability System, approximately two-thirds of all JCPS schools receive an overall rating of "red" or "orange" — the two lowest of five performance levels.
10.3.a	Recommendation: JCPS should assess its current suite of differentiated supports for schools rated "red" and "orange" with a clear focus on accelerating improvement in the lowest-performing schools.
10.4	Finding: JCPS received an "orange" overall performance rating for its elementary, middle, and high schools and is among only 4% of districts in Kentucky with this rating.
10.4.a	Recommendation: JCPS should establish districtwide, multi-year goals aligned to the Kentucky Accountability System in its new strategic plan to ensure progress on state-measured outcomes.
10.5	Finding: JCPS has a large number of schools with federal designations, demonstrating significant underperformance year after year. In the 2024-25 school year, JCPS saw an increase in the number of schools demonstrating persistent and/or school-wide underperformance (ATSI and CSI).
10.5.a	Recommendation: JCPS should evaluate its current differentiated supports for CSI, TSI, and ATSI schools. In particular, JCPS should assess the effectiveness of supports for TSI schools to prevent those schools from escalating to CSI or ATSI identification.
10.6	Finding: JCPS's school improvement model is unnecessarily complex, and it is unclear to the exam team how it works in practice to improve schools.
10.6.a	Recommendation: JCPS should streamline its school improvement model and clearly articulate how its components are intended to function together in practice to support and accelerate school improvement.

10.7	Observation: The Enhanced Support Zone model does not work as intended, given the number of schools that continue to be federally identified as CSI.
10.7.a	Recommendation: JCPS should evaluate the effectiveness of its Enhanced Support Zone (ESZ) support model for More Rigorous Intervention (MRI) schools, including whether the model provides sufficient differentiated supports. Based on the evaluation findings, JCPS should refine the model and resource allocation to ensure supports are targeted, non-duplicative, and matched to school needs.
10.8	Observation: JCPS's supports and requirements for CSI schools do not appear to be clearly defined or well-aligned, and they lack an overarching strategy.
10.8.a	Recommendation: JCPS should examine the totality of requirements for federally designated schools and ensure they are not requiring redundant or unnecessary time commitments of these schools.

CHAPTER 11: DIVERSITY, EQUITY & POVERTY

The exam team reviewed JCPS's policies, practices, and initiatives related to diversity, equity, and poverty. The chapter includes an assessment of the District's compliance with evolving federal and state guidance, its racial equity policy and planning structures, and student outcome data across key subgroups. The exam team considered the work of the Diversity, Equity, and Poverty (DEP) Division and its role in leading equity-related programs, tools, and supports across the District. The exam team analyzed student achievement gaps, teacher workforce diversity, and the coherence and use of District- and school-level racial equity plans. The alignment of equity goals, resources, and monitoring tools with broader District improvement efforts was also assessed.

Observations, Findings & Recommendations

11.1	Finding: It is necessary for JCPS to monitor federal guidance to ensure ongoing compliance.
11.1.a	Recommendation: JCPS should monitor the status of the latest federal guidance and update JCPS policies, as needed, in accordance with any changes.
11.2	Finding: JCPS has persistent gaps in student achievement across multiple student subgroups.
11.2.a	Recommendation: JCPS should increase its focus on raising the achievement of all students, with particular attention to closing achievement gaps for student subgroups that perform below the overall average.
11.3	Finding: In contravention of what is currently required by KRS 161.165 and state regulation, the demographic composition of the JCPS teacher workforce does not reflect the racial or ethnic diversity of the JCPS student population.
11.3.a	Recommendation: To comply with current state law, JCPS should evaluate the effectiveness of its current teacher recruitment and retention efforts, with particular attention to underrepresented groups. Based on this assessment, JCPS should strengthen what is working and consider making additional targeted investments to diversify its educator workforce. In complying with these state law requirements, JCPS should ensure it maintains a focus on academic achievement and career readiness.
11.4	Finding: School-level tools and resources maintained by the DEP Division are disconnected from each other, as well as from other implementation and progress monitoring tools.

	Specifically, they are disconnected from tools provided by the Schools and Academics Division. JCPS does not maintain data on how these tools and resources are used at the school level to be able to discern their resulting educational impact.
11.4.a	Recommendation: JCPS should assess the efficacy of the DEP tools and resources and how educators use them in practice. Based on this assessment, the recommended actions in Recommendation 10.3.b, current federal guidelines, and in coordination with other Central Office divisions, JCPS should consider combining, reducing the number of, or eliminating the tools.
11.4.b	Recommendation: JCPS should conduct targeted, school-level follow-up to better understand how DEP tools and resources are implemented and experienced in practice. Further study at the school level will provide needed insight into actual use and effectiveness.
11.5	Finding: The 2025-2028 JCPS Racial Equity Plan lacks clearly defined, actionable activities, progress measures, and goals.
11.5.a	Recommendation: JCPS should revise the 2025-2028 JCPS Racial Equity Plan and Progress Tracking Tool to include clearly defined and actionable activities, progress measures, and goals, with particular emphasis on academic achievement and career readiness.
11.6	Finding: The JCPS Racial Equity Policy and Plan refers only to students of color, when there are other student subgroups with persistent achievement gaps.
11.6.a	Recommendation: JCPS should revise the District Racial Equity Policy to include all subgroups that consistently demonstrate achievement gaps relative to the overall student population.
11.7	Finding: Based on a sample of school racial equity plans, these plans are more actionable than the District Racial Equity Plan, but they show uneven rigor and lack accountability structures that extend beyond their schools.
11.7.a	Recommendation: JCPS should review school equity goals and progress-monitoring activities to ensure they are all rigorous, actionable, and actually lead to improved academic outcomes for all students, with particular emphasis on academic achievement and career readiness.
11.8	Finding: Principals reported that the school racial equity plans felt burdensome and disconnected from other goal setting, progress monitoring, and reporting requirements.
11.8.a	Recommendation: JCPS should streamline the requirement for each school to develop a racial equity plan within other school-level goal setting, progress monitoring, and reporting requirements.
11.8.b	Recommendation: JCPS should reduce school-level reporting on racial equity plans through the Equity Monitoring Progress Tool (EMPT) from four times per year to twice per year.
11.9	Finding: There is no direct connection between the District Racial Equity Plan and individual schools' Racial Equity Plans.
11.9.a	Recommendation: JCPS should strengthen alignment between District- and school-level Racial Equity Plans to better understand progress on the District Racial Equity Plan, with particular emphasis on academic achievement and career readiness.

CHAPTER 12: EXCEPTIONAL CHILDREN EDUCATION

This chapter analyzes the JCPS systems serving exceptional children, including the District's special education, gifted and talented, and early childhood programs. JCPS procedures and practices for identifying and evaluating students to determine eligibility for special education programs were reviewed, as well as outcomes-focused data for students with disabilities, including academic achievement, graduation rates, and disciplinary involvement. Exam team survey data collected from families of children with disabilities and middle and high school students with disabilities receiving special education services in the District were also incorporated into this analysis. The exam team also addresses the JCPS structures, identifying gifted learners and the programmatic options available to those students. Preschool programs and practices, such as the availability of programs to children and families, as well as Kindergarten readiness and indicators of preschool student performance, were also analyzed.

Noteworthy Accomplishments

- Most Central Office and school-based staff who participated in the exam team survey reported that special education services provided by JCPS prepare students for post-secondary success.
- The JCPS four-year graduation rate for students with disabilities has improved by six percentage points between the 2022-23 school year and the 2024-25 school year, reaching 81%.
- A majority of families of students receiving special education services who participated in the exam team survey reported that they are happy with the special education services their child receives in the District.
- Most middle and high school students with disabilities who participated in the exam team survey reported that they have access to extracurricular activities and receive the help they need at school.
- Preschool students with disabilities who participated in JCPS early learning programs demonstrated growth in social-emotional skills, appropriate behaviors, and acquisition of knowledge and skills between program entry and program exit, based on data reported in the 2023-24 school year.

Observations, Findings & Recommendations

12.1	Finding: JCPS identifies students with Specific Learning Disabilities at rates below the national and statewide averages and identifies students with Other Health Impairments at higher rates than the national or statewide averages.
12.1.a	Recommendation: JCPS should review historic and current evaluation reports to examine the degree to which evaluation and eligibility processes are implemented consistently with the District's guidance and expected procedures.
12.1.b	Recommendation: JCPS should use the results of its record review to determine whether training is needed to ensure all school teams are appropriately identifying students with disabilities in accordance with the District's guidance, as well as state and federal laws.
12.1.c	Recommendation: If training is necessary to maintain fidelity to evaluation and eligibility determination processes, JCPS should provide that training. Training may need to be provided universally to all school teams, targeted schools, or both.
12.2	Finding: JCPS exhibits disproportionality in disability identification, with Hispanic students over-represented in multiple disability categories and Black students under- or over-represented in several categories when compared to District averages.
12.2.a	Recommendation: In reviewing current and historical evaluation reports, JCPS should explore whether inconsistencies exist in the application of eligibility criteria across sub-groups of students, specifically related to SLD, OHI, Developmental Delay, EBD, Autism, and MMD.

12.3	Finding: JCPS students who are multilingual are more likely to be identified as students with Specific Learning Disabilities, Autism, Developmental Delays, Speech or Language Impairments and Mild Mental Disabilities.
12.3.a	Recommendation: JCPS should examine current and historical evaluation reports and special education eligibility decisions to evaluate the degree to which ARCs across the District consistently and meaningfully consider language development when reviewing the presenting body of student performance data used to determine the presence of an educational disability.
12.3.b	Recommendation: Culturally and linguistically appropriate intervention/supplemental instruction practices should be implemented and documented at the Tier 2 and Tier 3 levels when referring a multilingual student for evaluation to determine special education eligibility.
12.3.c	Recommendation: The District should prioritize the active recruitment of multilingual evaluation staff to ensure evaluations of multilingual learners are conducted by personnel with appropriate linguistic and cultural expertise and can support evaluation teams in appropriately distinguishing language acquisition needs from disability-related factors.
12.4	Finding: JCPS does not provide written guidance on IEP development for multilingual learners.
12.4.a	Recommendation: JCPS should develop guidance for school-based teams outlining referral, evaluation, and eligibility determination considerations for multilingual learners suspected of having disabilities (e.g., assess student proficiency using the student's home language and English whenever feasible, use nonverbal assessments where appropriate, evaluate student performance with consideration to the stages of language acquisition, conduct peer comparisons against performance of culturally and linguistically similar peers) and provide ongoing training on this guidance.
12.5	Finding: JCPS is not meeting required state targets for Least Restrictive Environment (LRE) and the education of students with disabilities in general education settings.
12.5.a	Recommendation: JCPS should review student IEPs to examine why students are being removed from general education classrooms. The ECE Department, together with the Schools Division and Curriculum and Instruction Department, should use this information to inform the District's professional learning efforts to meet student needs through strong general education practices.
12.5.b	Recommendation: JCPS should review how well high-quality instructional materials are used within general education settings to support all students, including those with IEPs. New materials should include built-in learning supports that support the accessibility of materials for students with disabilities.
12.5.c	Recommendation: JCPS should ensure all educators receive foundational and ongoing training and support (i.e., coaching) regarding evidence-based instructional strategies and learning environment adaptations/structures that promote the access of students with disabilities within Tier 1 classrooms, as well as access to Tier 2 and Tier 3 intervention opportunities when needed.
12.5.d	Recommendation: JCPS should continue efforts to expand professional learning opportunities related to collaborative teaching and High-Leverage Practices to serve students with disabilities in less restrictive educational settings.

12.5.e	Recommendation: JCPS should continue ongoing efforts to ensure school teams receive timely guidance and training on making data-based decisions regarding LRE decisions for students served by special education.
12.6	Finding: Most students with disabilities in JCPS do not demonstrate grade-level reading proficiency.
12.6.a	Recommendation: JCPS should review how well existing reading materials are being consistently used across grade levels to ensure instruction is explicit, systematic, and accessible for students with disabilities and other student groups who may require extra support with grade-level learning.
12.6.b	Recommendation: The District should refine/develop tiered support systems by screening student reading skills several times a year and clearly defining criteria for providing and adjusting student interventions by using consistent progress monitoring tools.
12.6.c	Recommendation: JCPS should conduct a Districtwide examination of IEPs to evaluate rigor, instructional clarity, and alignment to grade-level literacy expectations. Use findings to provide targeted professional learning and coaching for special educators focused on developing standards-aligned IEPs with clearly defined, skill-specific reading goals (e.g., decoding, fluency, comprehension). Ensure IEP goals are aligned to the District's literacy scope and sequence and explicitly connected to common progress-monitoring tools, strengthening instructional coherence and improving students' access to the general education curriculum.
12.7	Finding: JCPS students with IEPs demonstrate limited grade-level mathematics proficiency. Rates of mathematics proficiency among students served by special education in JCPS lag behind those of two out of three comparable school districts.
12.7.a	Recommendation: JCPS should review how well existing mathematics materials are being consistently used across grade levels to ensure instruction is explicit, systematic, and accessible for students with disabilities and other student groups who may require extra support with grade-level learning.
12.7.b	Recommendation: The District should refine/develop tiered support systems by screening student mathematics skill development several times a year and clearly defining criteria for providing and adjusting student interventions by using consistent progress monitoring tools.
12.7.c	Recommendation: The District should provide targeted training and coaching for special educators to strengthen standards-aligned IEPs and mathematics goal development, with an emphasis on identifying and addressing critical prerequisite math skills. Deliver targeted professional learning and coaching to educators in designing specially designed instruction that combines frequent cumulative review of previously learned concepts with systematic, explicit instruction to introduce and practice new math skills. Prioritize foundational concepts (e.g., number sense, place value, etc.) in early grades and embed focused intervention in later grades to address persistent gaps in students' mathematical understanding.
12.8	Finding: Students with disabilities in JCPS are more likely to experience the use of physical restraint or seclusion than non-disabled students.

12.8.a	Recommendation: JCPS should verify discipline, restraint, and seclusion policies are aligned with IDEA requirements for the use of positive behavioral interventions for students with behavioral needs and ensure schools are fully aware of these requirements.
12.8.b	Recommendation: The District should expand implementation of evidence-based frameworks at the Tier 1 level such as Positive Behavioral Interventions and Supports (PBIS) and ensure that Behavior Intervention Plans (BIPs) for students with disabilities are consistently implemented and monitored.
12.8.c	Recommendation: The District's ECE Department, in partnership with the Department of Culture and Climate, should provide ongoing professional development and training for administrators, educators, and support staff on understanding disability-related behaviors and aligned evidence-based practices to support student needs related to such behaviors.
12.9	Finding: Students with disabilities in JCPS are more likely to be involved in school disciplinary events than their non-disabled peers.
12.9.a	Recommendation: JCPS should conduct quarterly reviews of disciplinary data, including uses of restraint and seclusion, disaggregated by disability status, school, and staff involvement to identify patterns and themes and follow up with schools to ensure that Functional Behavioral Assessments (FBAs) are conducted and BIPs are developed, implemented, or updated where discipline data suggests current levels of support are not sufficient.
12.9.b	Recommendation: The District should explore opportunities to strengthen family partnerships with school-based teams regarding proactive behavioral planning for students with IEPs; prioritizing individualized, proactive strategies rather than reactive disciplinary responses to address challenging student behaviors related to identified disabilities.
12.10	Finding: African American students, Hispanic students, and English Learners are represented at lower rates in JCPS gifted and talented programs while white students and Asian students are represented at higher rates when compared to overall district enrollment.
12.10.a	Recommendation: The District should continue to monitor disproportionate identification practices across gifted and talented programs.
12.10.b	Recommendation: JCPS should develop research-based guidance for appropriate identification of multilingual learners as gifted and talented. Guidance should be developed in partnership between the ECE Department and the Office of Multilingual Learners with a focus on supporting monolingual educators in identifying indicators of potential giftedness in students who are developing second language proficiency.
12.10.c	Recommendation: JCPS should include information about characteristics of gifted learners provided in multiple languages to parents/families and take steps to ensure multilingual or non-English speaking families are aware of recommendation and identification practices for the District's gifted and talented program.
12.11	Finding: JCPS's early learning programs have consistently failed to prepare preschool students with disabilities for kindergarten.
12.11.a	Recommendation: The District should examine success factors related to student performance in social and emotional readiness and identify replicable structures to increase rates of student success across other aspects of Kindergarten readiness.

12.11.b

Recommendation: JCPS should examine best practices utilized in comparable districts related to early childhood special education, identify priorities for program improvement, and develop an implementation plan to build staff capacity and strengthen Kindergarten readiness.

CHAPTER 13: MULTILINGUAL RESOURCES & SUPPORTS

The chapter examines how JCPS supports multilingual learners (MLs) across the District. The exam team reviewed the District's vision and strategy, enrollment and identification processes, service delivery models, instructional resources, and staffing structures for MLs. Particular attention was given to the work of the Office of Multilingual Learners (OML), as well as how its efforts are supported and complemented by the Academics, Schools, Exceptional Children Education, and Chief of Staff divisions. The review also considers state and federal requirements related to ML services and how those requirements are implemented in practice. Finally, the exam team analyzed student achievement and growth of MLs, and how effectively the District is building capacity and allocating resources to support a rapidly growing ML population.

Noteworthy Accomplishments

- The District has articulated an asset-based, whole-child vision for MLs that emphasizes culturally responsive instruction and the development of language through meaningful interaction.
- JCPS has taken steps to strategically allocate additional resources to high-density ML schools, providing prioritized coaching, specialized instructional support, and additional staffing to schools serving the highest concentrations of MLs.

Observations, Findings & Recommendations

13.1	Finding: While JCPS has an asset-based vision for supporting ML students, the District lacks a clear, actionable plan for supporting ML student achievement.
13.1.a	Recommendation: JCPS should develop and implement a clear, Districtwide strategy for supporting ML achievement that translates the District's asset-based vision into actionable goals, defined strategies, and measurable outcomes aligned to its broader academic strategy.
13.2	Finding: District staff identified building the capacity of all educators to effectively serve Multilingual Learners (MLs) as an area of growth.
13.2.a	Recommendation: JCPS should assess the effectiveness of its professional development and coaching supports for serving MLs and strengthen them as needed to ensure all teachers can consistently implement differentiated instructional strategies and effective co-teaching practices.
13.3	Finding: JCPS has an achievement gap between ML and non-ML students.
13.3.a	Recommendation: JCPS should use NAEP and other assessment data to inform targeted instructional supports, professional learning, and resource allocation aimed at reducing persistent achievement gaps between ML and non-ML students.

CHAPTER 14: COLLEGE & CAREER READINESS

The exam team conducted a comprehensive overview of JCPS's strategies, offerings, outcomes, and challenges related to college and career readiness. This chapter details the District's programming from middle school through high school, including Career and Technical Education (CTE), the Academies of Louisville, magnet schools, partnerships, and advanced coursework. The exam team analyzed data related

to pathway and program participation and enrollment, academic credits and credentials earned, and graduate outcomes.

Noteworthy Accomplishments

- Since its inception in 2017, JCPS has scaled the Academies of Louisville model to all high schools in the District, with 72% of all JCPS high school students enrolled. The Academies of Louisville model was noted as a strength of the District by stakeholders. The model connects high school education with local industry needs, career-themed learning communities and personalized pathways, workplace skills, and college credits to prepare students for the 21st-century workforce.
- JCPS career pathway enrollment is aligned with Kentucky's in-demand sectors, as identified by the Kentucky Workforce Innovation Board (KWIB). JCPS closely collaborates on industry partnerships with the regional workforce board, KentuckianaWorks, through the Academies of Louisville Alliance.
- In recent years, JCPS has seen positive gains in student outcomes related to dual credit participation, Advanced Placement qualifying scores, postsecondary readiness indicator rates, and graduation rates.

Observations, Findings & Recommendations

14.1	Finding: JCPS has a decentralized model and lacks systems to coordinate partnership development, with both internal staff and external organizations managing partnerships on behalf of JCPS.
14.1.a	Recommendation: JCPS should review all roles Districtwide that include community partner engagement as a component of the job description and identify systems to improve efficiency, communication, collaboration, and coordination amongst staff and outside agencies (including the Academies of Louisville Alliance) that engage with partners.
14.1.b	Recommendation: JCPS should develop or procure a centralized tracking system for partner relationship management that can be shared with outside agencies supporting partnership development, such as the Academies of Louisville Alliance.
14.1.c	Recommendation: In coordination with the Academies of Louisville Alliance, JCPS should identify gaps across schools related to partner engagement and develop strategies and goals for targeted partner engagement and expansion of student opportunities with partners.
14.2	Observation: The District does not have an updated repository of college and career readiness resources on the District website that is available to all families and students.
14.2.a	Recommendation: JCPS should update the JCPS Students and Families webpage with current college and career readiness resources and links to serve as a central repository for this information.
14.3	Finding: While postsecondary readiness rates have increased in the District, there continue to be postsecondary readiness gaps for African American and Hispanic/Latino students as well as English Learners, economically disadvantaged students, and students with disabilities.
14.3.a	Recommendation: JCPS should develop targeted postsecondary readiness resources and support to increase postsecondary readiness scores of African American and Hispanic/Latino students, as well as English Learners, economically disadvantaged students, and students with disabilities.

14.3.b	Recommendation: JCPS should develop, track, and report on postsecondary readiness score targets for subgroups.
14.4	Finding: Hispanic or Latino students and English Learners have lower graduation rates than their peers and are the only groups with declines from 2023-24 to 2024-25.
14.4.a	Recommendation: JCPS should develop targeted graduation readiness supports and interventions to increase graduation rates among English Learners and Hispanic/Latino students.
14.4.b	Recommendation: JCPS should develop, track, and report on graduation rate targets for subgroups.
14.5	Observation: KDE data on graduate outcomes at the district level is limited.
14.5.a	Recommendation: JCPS should collaborate with KYSTATS and utilize their data and reporting to better understand outcomes for JCPS graduates and how it can inform JCPS strategies and goals around college and career readiness preparation.

CHAPTER 1: DISTRICT LEADERSHIP & STRATEGY

CONTEXT

JCPS is led by a superintendent who reports to the Jefferson County Board of Education (JCBE). This leadership structure is discussed in more detail in **Chapter 2: JCPS Board of Education**. JCPS has had five superintendents over the last 20 years.

The recent history of JCPS superintendents is as follows:²²

- Dr. Brian Yearwood (2025-Present)
- Dr. Martin “Marty” Pollio (2017-2025)
- Dr. Donna Hargens (2011-2017)
- Frida Merriweather (Interim) (2011)
- Sheldon Berman (2007-2011)

Dr. Marty Pollio and Dr. Brian Yearwood were the superintendents during this examination period.

Superintendent Pollio

Dr. Pollio’s exit from JCPS came during the early months of this special examination. The exam team had the opportunity to interview Dr. Pollio and get his perspective on the major accomplishments and challenges that occurred during his time as JCPS Superintendent, as well as the opportunities that lie ahead for the District.

The pandemic, staffing shortages, transportation, discipline, and political turmoil were cited by Dr. Pollio as some of the major challenges he dealt with during his tenure. Successes Dr. Pollio highlighted from his time as Superintendent included seeing improvements in school bus transportation route punctuality, major facilities and grant donations equivalent to tens of millions of dollars, school choice, expanding Academies of Louisville, implementing K-12 aligned literacy and math curriculum across all JCPS schools, and resourcing high poverty schools, among many others.²³

Superintendent Yearwood

Dr. Brian Yearwood was selected as the new Superintendent of JCPS effective July 1, 2025. Background on the search and selection process for the new Superintendent is outlined in **Chapter 2: JCPS Board of Education**.

Dr. Yearwood began his superintendency facing several major issues, including:

- \$188M budget deficit and need to make budget cuts and increase financial transparency
- Loss of community trust following the 2023-24 bus and transportation issues
- Staffing shortages and concerns regarding recruitment, retention, and compensation

He acknowledged these issues and provided updates as they evolved throughout summer and fall of 2025 during community forums, press conferences, and other statements to the JCPS community.

In his exam interviews, Dr. Yearwood discussed priorities for his tenure, which included but were not limited to:

- Development of an actionable strategic plan that helps JCPS grow continuously

²² “[Office of the Superintendent](https://www.jefferson.kyschools.us/page/jcps-superintendent).” Jefferson County Public Schools. Retrieved December 17, 2025.

<https://www.jefferson.kyschools.us/page/jcps-superintendent>

²³ “[Jefferson County Public Schools State of the District, 2025](https://www.youtube.com/watch?v=TrK6vCobECQ).” YouTube. Published February 26, 2025. Retrieved December 17, 2025. <https://www.youtube.com/watch?v=TrK6vCobECQ>

- Student growth and proficiency
- Stronger collaboration between Academics and Schools divisions to support curriculum implementation
- Organizational structure efficiencies, reducing redundancy and increasing effectiveness
- Improving internal communication and culture
- Stakeholder engagement and transparency, including building community trust
- Budget and financial management, including addressing the budget deficit and increasing financial transparency
- Staff recruitment and retention, including leadership development
- Accountability and use of school-level data dashboards to understand literacy rates, behavior, and discipline metrics
- Teaching and support strategies that lead to positive student outcomes
- Student preparation to be productive citizens by improving critical thinking and comprehension skills

Several of the observations and findings in this special examination report align with Dr. Yearwood's stated priorities, including the budget deficit and fiscal transparency, staffing shortages, student proficiency, and organizational structures for efficiency and collaboration.

LEADERSHIP ORGANIZATIONAL STRUCTURES

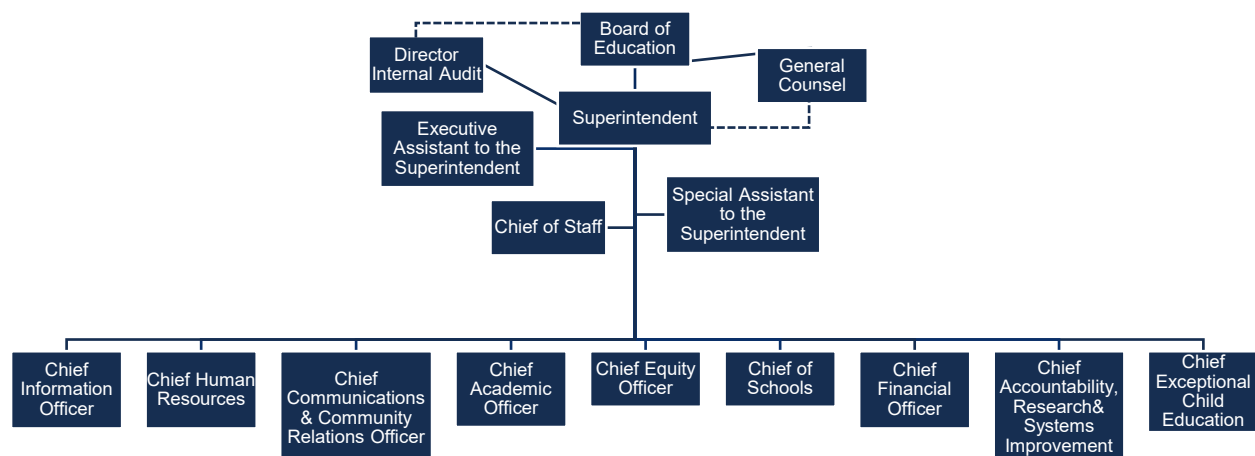
Cabinet Leadership

Observation	
1.1	JCPS has a more decentralized organizational structure and a higher number of superintendent direct reports compared to peer districts.

Organizational Structure

As shown in Figure 14, the JCPS leadership-level organizational structure as of December 2025 includes 12 chiefs plus an Executive Assistant, a Special Assistant to the Superintendent, and a Director of Internal Audit who report directly to the Superintendent. The General Counsel reports to the Board of Education with a dotted line to the Superintendent. The only new leadership role established during the first six months of Dr. Yearwood's superintendency was the Special Assistant to the Superintendent.

FIGURE 14: JEFFERSON COUNTY PUBLIC SCHOOLS ORGANIZATIONAL CHART, DECEMBER 2025



Source: Jefferson County Public Schools Organizational Charts website.

The majority of this leadership organizational chart structure (with the exception of the new Special Assistant to the Superintendent role) was in place during Dr. Pollio’s tenure. At the beginning of his superintendency, Dr. Pollio made changes to the leadership structure following recommendations that came out of a 2018 organizational review report conducted by the Council of Great City Schools (CGCS).

The changes implemented by Superintendent Pollio did not substantially decrease the number of direct reports to the superintendent. The organizational chart remained wide, with a reorganization of some key functions and roles. Changes included establishing new offices (such as General Counsel), elevating key functions to chief-level roles (such as Human Resources), and consolidating other functions (such as moving school choice under the Chief of Schools). The new role of Chief of Exceptional Child Education was added as a result of a state-directed corrective action in 2019. The Chief of Police role was added in 2023 to lead the new JCPS Police Department.

Organizational Structure Compared to Peer Districts

When compared to peer school districts (as shown in Figure 15), JCPS has the highest number of chiefs and direct reports to the superintendent, creating a very decentralized organizational structure.

FIGURE 15: SUPERINTENDENT DIRECT REPORTS, JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS

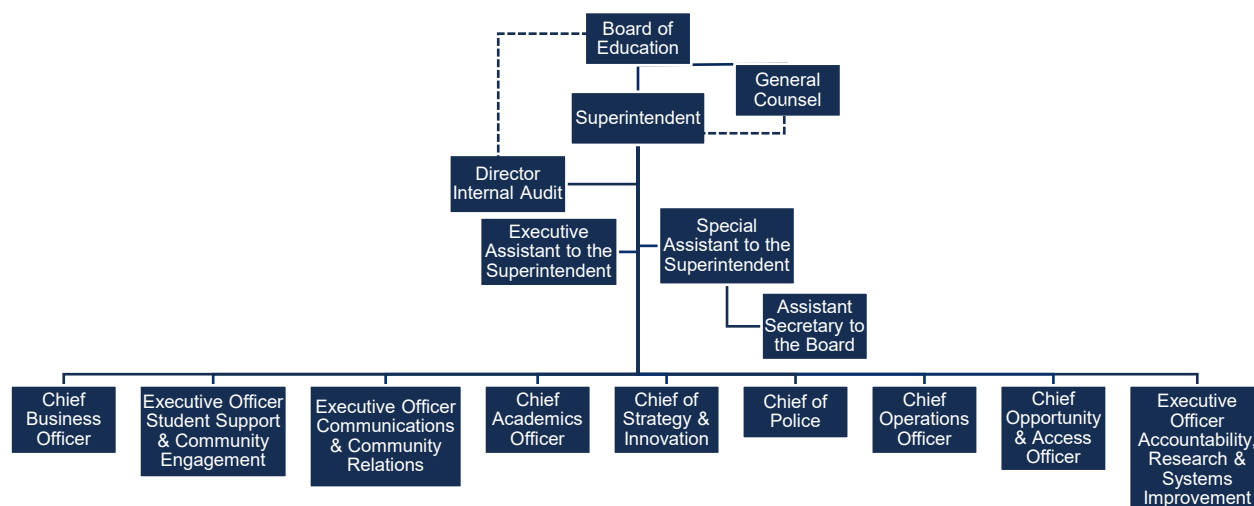
SCHOOL DISTRICT	Direct Reports
Jefferson County Public Schools	14
Baltimore County Public Schools	6
Duval County Public Schools	12
Guilford County Schools	6
Metropolitan Nashville Public Schools	9
Pinellas County Schools	10
San Diego Unified School District	5

Sources: *Jefferson County Public Schools website; Baltimore County Public Schools website; Duval County Public Schools website; Guilford County Schools website; Metropolitan Nashville Public Schools website; Pinellas County Schools website; San Diego Unified School District website.*

Note: *Direct reports represent chief-level roles (and in a few cases director and special assistant roles who oversee functions like Board Relations and the Office of the Superintendent). This figure does not include executive assistants.*

As noted in **Project Background & Methodology**, during the examination, Superintendent Yearwood announced plans for organizational restructuring and staffing cuts, effective July 1, 2026, for the 2026-27 school year. The new organizational chart that was approved by the Board on February 10, 2026, is shown in Figure 16.

FIGURE 16: NEW ORGANIZATIONAL CHART APPROVED FEBRUARY 2026 TO TAKE EFFECT JULY 2026



Source: Jefferson County Board of Education Work session Meeting, February 10, 2026.

Under the new organizational structure, the number of direct reports to the superintendent will be reduced from 14 to 11 (not including the Executive Assistant to the Superintendent role). The number of Chief and Executive Officer positions will be reduced by two and the Chief of Staff role will be eliminated. These changes generally align with the exam team's recommendation to reduce the number of direct reports to the superintendent. As part of the development of a new District strategic plan (discussed later in this chapter), JCPS leadership should ensure that cabinet roles align with strategic goals in areas such as student achievement and operational efficiency.

Recommendation	
1.1a	JCPS should reduce the number of direct reports to the superintendent. Ensure cabinet roles align with strategic goals.

Executive District Functions

As described below, there are several divisions that work closely with the Superintendent's office and support the District in advancing District strategy and supporting staff, including Chief of Staff, Internal Auditor, General Counsel, and ARSI.

Chief of Staff

Observations	
1.2	The JCPS Chief of Staff has multiple functions that do not typically fall under a school district Chief of Staff role, such as school culture and climate, student support services, and health.
1.3	The new Special Assistant to the Superintendent role serves as a strategic advisor to the superintendent, rather than the Chief of Staff.

As of the 2025-26 school year, the JCPS organizational chart has several operational and student support functions under the Chief of Staff. JCPS staff leaders reported that during Dr. Pollio's tenure, the Chief of Staff was often given special projects and functions to manage during times of need. For example, during the pandemic, all health-related District activity was placed under Chief of Staff during what was a time of crisis-management. Culture and climate was led by the Chief of Staff because the staff member filling the role had prior experience as Associate Superintendent of Culture and Climate and therefore understood

the needs of that team. Another example was the new JCPS Police Department, which was originally placed under the Chief of Staff prior to it becoming its own division. According to staff, this practice of placing new and challenging initiatives under the Chief of Staff was effective. However, while some functions have been reorganized elsewhere (such as JCPS Police Department), several remain under the Chief of Staff (such as student support services) that could be reorganized elsewhere within the District divisions.

As part of the organizational restructuring that will take effect for the 2026-27 school year, the Chief of Staff role has been eliminated. The functions that fell under the Chief of Staff role will be redistributed. For example, the Assistant Superintendent for School Culture and Climate role, which used to report to the Chief of Staff, will be eliminated; instead, an Executive Director of Success and Resilience will “lead the development of positive school climate and culture throughout the District” under the Chief of Strategy and Innovation.²⁴ Health and other student support functions will move to a new Division under an Executive Officer of Student Support and Community Engagement.²⁵

In a school district, the Chief of Staff role should function as a strategic advisor to the superintendent, helping to ensure strong communication and collaboration across divisions and reduce demands on the superintendent’s time. In the first six months of Superintendent Yearwood’s tenure, the exam team observed that the Chief of Staff role was not being used in that way. It is common for new school district leaders to appoint a new staff person to serve as their strategic advisor. The new Special Assistant to the Superintendent role has fulfilled the special advisor function while the Chief of Staff oversees the aforementioned District operational and student support functions, along with involvement in Board coordination. The Chief of Staff role can be eliminated with the assumption that the Special Assistant to the Superintendent will continue to serve as a strategic advisor to the Superintendent and the departments that fall under the Chief of Staff are redistributed to other divisions.

Recommendations	
1.2.a	JCPS should redistribute the departments and teams that fall under the Chief of Staff to other JCPS divisions.
1.3.a	JCPS should eliminate the Chief of Staff role and continue to utilize the Special Assistant to the Superintendent role as the strategic advisor to the superintendent.

General Counsel

JCPS had a General Counsel providing in-house legal services until 2012, followed by a gap of five years without a General Counsel where the District relied on outside legal services. Superintendent Pollio re-established the General Counsel role in 2018 and the office began expanding to build out a legal team of specialists in 2021.

Today, the office is led by a General Counsel who reports directly to the Board and indirectly to the superintendent. The General Counsel is supported by four assistant general counsels who each specialize in one of the following areas:

- Compliance and Investigations
- Student Support
- Contracts, Insurance, and Data Sharing
- Human Resources

Expansion of the office has added resources for staff across JCPS in the form of trainings and professional development and additional attorneys with specialized legal expertise who are available to answer questions and provide guidance to JCPS staff. In focus groups, principals shared their appreciation for the

²⁴ “[Jefferson County Regular Work Session Meeting](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53174&AgencyTypeID=).” Kentucky School Boards Association. Published February 10, 2026. Retrieved March 19, 2026.

<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53174&AgencyTypeID=>

²⁵ Ibid.

General Counsel's office, noting staff in the office were helpful and responsive to questions. The General Counsel's office administers a legal institute in which they have trained over 400 staff in the last two years, according to office leadership. Training topic ideas come from surveying staff and looking at data related to the types of calls and questions the office receives. Trainings have included topics such as:

- School management of investigations when there is an allegation against an employee
- Changes to special education law

The target audience for trainings is building administrators, including principals, assistant principals, and counselors or other roles relevant to particular trainings.

Policy and Systems

An Executive Administrator of Policy and Systems reports to the General Counsel. This role supports the Board's Policy Committee by developing and disseminating Board policies and procedures and monitoring their implementation. JCPS typically follows the Kentucky School Boards Association (KSBA) model policies that are based on state and federal laws and adapts them, as needed, for JCPS. The policy making process for the District is discussed in more detail in **Chapter 2: JCPS Board of Education**.

Government and Community Relations

Executive Administrator of Government and Community Relations also reports to the General Counsel. This role coordinates legislative efforts, working with state and local governments, as well as community groups. This role is in Frankfort several days a week meeting with legislators and monitoring legislation that affects District or education priorities. This role supports a feedback loop between the state legislature, local city government officials, and District stakeholders.

Roles dedicated to policy and government relations are common among large, urban school districts. All JCPS peer districts analyzed for this exam had roles dedicated to these functions.

Internal Audit

The Internal Audit Department serves as JCPS's independent office with the ability to investigate complaints from any and all sources regarding matters related to the District. The Internal Audit Department organizational structure, functions, processes, and reporting, are discussed in detail in **Chapter 3: Internal Audit**.

Accountability, Research, and Systems Improvement (ARSI)

The mission of the ARSI division is "advancing research, applying knowledge, and securing resources to inspire learning."²⁶ ARSI covers the following functions:

- Accountability and data systems
- Research and evaluation
- Systems improvement
- Resource development
- Testing

Overall, ARSI plays an important role in supporting and guiding schools and District leadership around state accountability, data and reporting, program evaluation, school and District improvement planning, and grants. These functions help JCPS track metrics and goals and better understand areas for improvement.

²⁶ "[Accountability, Research, and Systems Improvement \(ARSI\)](https://sites.google.com/jefferson.kyschools.us/research/home)." JCPS ARSI. Retrieved January 7, 2026. <https://sites.google.com/jefferson.kyschools.us/research/home>

Goals and Guardrails Tracking

Observation	
1.4	The Assistant Director for Accountability and Research role in Accountability, Research, and Systems Improvement (ARSI) division will require elimination or revision as the District moves away from Goals and Guardrails and adopts new goals and a strategic plan.

Among the direct reports to the Chief, an Assistant Director for Accountability and Research oversees Goals and Guardrails, described later in this chapter, and the tracking of the related data metrics. Because JCPS is shifting away from the Goals and Guardrails student outcomes focused framework, as indicated by the Comprehensive District Improvement Plan (CDIP), Superintendent Yearwood, and other District leaders, this role will require attention – specifically either elimination of the role or a revised job description to account for a new JCPS Strategic Plan and set of goals. The exam team’s observations indicate that it is not necessary to have a full-time position overseeing Goals and Guardrails, particularly since target metrics were still in development and there did not appear to be a widespread understanding or use of the Goals and Guardrails in the District.

The organizational restructuring that will be in effect for the 2026-27 school year includes the elimination of the Assistant Director for Accountability and Research role. This change aligns with the exam team’s recommendation. It is important for the District to have mechanisms in place to track and report on data metrics related to District goals and holding stakeholders accountable. This should be a collaborative effort by cabinet-level staff under leadership from the superintendent, as well as staff designated to oversee District strategy and data (such as the new Executive Officer for Strategy and Innovation and the revised role of the Executive Officer for Accountability, Research, and Systems Improvement).

Recommendation	
1.4.a	JCPS should eliminate or revise the Assistant Director for Accountability and Research role in ARSI to account for the District’s shift away from Goals and Guardrails and forthcoming adoption of new goals and a strategic plan.

School-level Leadership

School-Based Decision Making Councils

Observation	
1.5	Leaders from special schools lacking School-Based Decision Making (SBDM) councils noted a lack of the same school-level authority afforded to schools represented by SBDMs.

The purpose of School-Based Decision Making (SBDM) councils, mandated by KRS 160.345 for all participating public schools in Kentucky, is to promote shared leadership among parents, teachers, and the school building administrators (principals) by giving them involvement in the decision-making process to meet state educational goals. SBDMs adapt state and district-level goals and policies to the needs of their school, allowing school-level decision making authority related to personnel and policy.

In accordance with statute and based on feedback from Central Office and school-level staff, SBDMs have broad authority in school-level budget management, staffing allocations, and policies as long as they remain within District-provided parameters and align with District goals. Examples of SBDM involvement with staffing allocations is described in **Chapter 4: Finance**.

Exemptions to SBDMs meeting certain requirements are allowed under state law. In focus groups, principals from “special schools” — schools operating special education programs, alternative education programs, and state agency children’s programs — noted that many of the special schools do not have

SBDMs and therefore lack some school-level authority afforded to schools that are represented by SBDMs.²⁷ According to staff, this lack of authority has been an issue for special schools as it relates to personnel needs. For example, schools without an SBDM have less capacity to manage or make school-specific adjustments to personnel allocations, particularly for hard-to-fill-roles in special education and mental and behavioral health supports. In the absence of a SBDM, personnel needs are funneled from staff up through the Principal to JCPS administration.

Recommendation	
1.5.a	JCPS administration should work with schools currently lacking SBDMs to assess the feasibility of establishing an SBDM and opportunities for increased school-level authority, decision-making, and communication.

Legislative Changes

Observation	
1.6	2022 Senate Bill 1, the Kentucky Supreme Court's 2025 decision in <i>Coleman v. Jefferson County Board of Education</i> , 2026 Senate Bill 1, and 2026 Senate Bill 4 have effectuated many changes within JCPS. Current JCPS policies and procedures are not reflective of the most up-to-date status of all these changes.

In 2022, the Kentucky General Assembly passed Senate Bill 1 to amend KRS 160.345 to shift some responsibilities from SBDMs and the elected school board to the superintendent. Several key changes to the law included in Senate Bill 1 are listed below:

- Gave increased spending power to the superintendent without direct Board approval, including increasing the dollar value threshold for the superintendent's approval of contract purchases from \$20,000 to \$250,000 and the ability for the superintendent to approve a line-item transfer within the district annual budget for individual transfers up to \$250,000.
- Required the superintendent, instead of the SBDM, to determine curriculum after consulting with the principal and SBDM and after a stakeholder response period.
- Required allocations to schools by local school boards to be determined by the principal after consultation with the SBDM instead of being determined by the SBDM.
- Alter the principal hiring process by requiring the principal to be selected by the superintendent after consultation with the SBDM.
- Limited the number of times the school board could meet to not more than once every four weeks for the purpose of approving necessary administrative matters

The exam team's analysis showed that some JCPS practices and JCBE policies appeared to reflect the authorities granted under Senate Bill 1, particularly in the areas of school hiring and curriculum.

- **School Hiring:** As described by Superintendent Pollio in June 2025, under Senate Bill 1, SBDMs do not hold sole authority in principal hiring decisions. The typical process used by Superintendent Pollio was to interview candidates with the Schools division team and submit two to three final candidates to the SBDM to make a final determination. This practice was reflected in JCBE Policy 02.4244, last updated July 19, 2022. The school hiring policy discusses the roles and

²⁷ "[JCPS Alternative and Specialized Option School Overview: Board Report](https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=775206#:~:te...)," Kentucky School Boards Association. Published November 14, 2023. Retrieved March 19, 2026.
<https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=775206#:~:te...>

responsibilities of the superintendent and SBDM as it relates to hiring school principals and other vacant roles, in alignment with KRS 160.345.²⁸

- **Curriculum:** Prior to Senate Bill 1, every SBDM could determine what curriculum would be used by their school, resulting in a wide range of curricula used across the District. Once Senate Bill 1 transferred that role to the superintendent, the District moved to a single curriculum. The new curriculum is discussed in **Chapter 9: Curriculum & Instruction**. JCBE Policy 08.1 was last updated July 29, 2025, and includes language regarding the superintendent's responsibility to select curriculum that aligns with KRS 160.345.²⁹

In December 2025, the Kentucky Supreme Court — after having previously upheld the law (in 2024) — overturned Senate Bill 1 on the grounds that the law violated the Kentucky Constitution because it treated JCPS different from all other school districts in the Commonwealth without, according to the Court, sufficient reasonable justification.³⁰ After that decision, the General Assembly passed Senate Bills 1 and 4 during its 2026 regular session. These bills impose several structural and regulatory changes (like that of 2022 Senate Bill 1) and include numerous reasons for doing so. Although Senate Bills 1 and 4 were vetoed by the Governor, both bills were overridden in the Senate and House of Representatives in April 2026. Senate Bill 1 will shift more authority to the JCPS superintendent and require a two-thirds vote of JCBE to override decisions. Senate Bill 4 will reduce JCBE from seven members to five, and will require all JCBE seats be up for election in November 2026, regardless of when members were elected.

The JCPS Executive Administrator for Policy and Systems reported in November 2025, just prior to the Supreme Court ruling, that JCPS was ready to make any necessary policy changes based on the outcome of the ruling. Because of the timing of this examination, in conjunction with the passage of 2026 Senate Bills 1 and 4, the details of the implementation of those two bills are unknown but believed to be on the radar of relevant JCPS officials.

Recommendation	
1.6.a	JCPS should monitor the status of the latest legislative changes and update JCPS policies, as needed, in accordance with those changes.

DISTRICT STRATEGY

Strategic Plan

Finding	
1.7	JCPS lacks a current, cohesive strategic plan that outlines District priorities and goals.

Board Policy on JCPS Educational Philosophy

As described in **Chapter 2: JCPS Board of Education**, JCBE is required to establish Districtwide goals and objectives that are meant to set the JCPS philosophy on education and guide the JCPS administration's

²⁸ "Jefferson County Board of Education Policy 02.4244 School Hiring SBDM." Jefferson County Board of Education Policy Manual. Published July 19, 2022. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

²⁹ "Jefferson County Board of Education Policy 08.1 Curriculum." Jefferson County Board of Education Policy Manual. Published July 29, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

³⁰ Horsley, McKenna. "KY Supreme Court changes course, strikes down law singling out Jefferson County schools." Kentucky Lantern. Published December 18, 2025. Retrieved December 18, 2025. <https://kentuckylantern.com/2025/12/18/ky-supreme-court-changes-course-strikes-down-law-singling-out-jefferson-county-schools/#:~:text=In%20a%204%2D3%20ruling,spelled%20out%20in%20the%20legislation>

development of annual objectives and budget priorities. Those objectives are set in 2013 JCBE Policy 01.54 and are focused on four areas:³¹

- Increased learning
- Graduation and beyond
- Stakeholder involvement/engagement
- Safe, resourced, supported and equipped schools.

The objectives are broad and appear to be generally reflected in the District's most recent strategic plan, which is discussed below.

Mission and Vision

The JCPS mission, vision, and pillars, as outlined on the JCPS website are as follows: ³²

- **Mission:** To challenge and engage each learner to grow through effective teaching and meaningful experiences within caring, supportive environments
- **Vision:** All Jefferson County Public Schools students graduate prepared, empowered, and inspired to reach their full potential and contribute as thoughtful, responsible citizens of our diverse, shared world.
- **Three Pillars:** Journey to Success, Racial Equity, Culture & Climate

Vision 2020

The District's most recent formal strategic plan was *Vision 2020: Excellence with Equity* and was developed under Superintendent Hargens' leadership. The five-year plan (2015-2020) included a stated mission, vision, and core values. Vision 2020 outlined three focus areas shown in Figure 17:

FIGURE 17: VISION 2020 FOCUS AREAS AND GOALS

FOCUS AREA	Goal(s)
Learning, growth, and development	Deeper learning
Increasing capacity and improving culture	Professional capacity in teachers and leaders High-performing teams and professional learning communities
Improving infrastructure and integrating systems	Infrastructure improvements Communications, engagement, and access to information Technology for learning and operations Access to public school choice

Source: Jefferson County Public Schools Vision 2020.

Each focus area had related strategies, targets, and leading indicators. Some targets included specific numeric metric goals to achieve by 2020, while others were described broadly — using terms such as “increase the percentage” — with a reference indicating specific measures would be developed in 2015-16

³¹ “[Jefferson County Board of Education Policy 01.54 Education Philosophy](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Published May 28, 2013. Retrieved November 26, 2025.
<https://policy.ksba.org/Chapter.aspx?distid=56>

³² “[About JCPS](https://www.jefferson.kyschools.us/page/about).” Jefferson County Public Schools. Retrieved January 5, 2026.
<https://www.jefferson.kyschools.us/page/about>

school year. The exam team did not, however, find evidence of the development of specific metrics not originally included in the plan.

Vision 2020 In Action

A complementary publication was produced in 2018 called *Vision 2020 In Action*. This publication came out approximately two years into the original plan's implementation and followed a transition from Superintendent Hargens to Superintendent Pollio. This publication was described by Superintendent Pollio in the introductory letter of the document as "a detailed plan that outlines out district's path to success over the next two years."³³ This publication appears to reframe and update the original Vision 2020 plan. Newly defined and branded initiatives and policies noted in the updated plan include:

- Backpack of Success Skills
- Teacher Backpack
- Racial Equity Policy
- Louisville Promise

The exam team observed that the Vision 2020 focus areas and goals and the subsequent initiatives described in Vision 2020 In Action do appear to have some alignment with the three JCPS pillars.

- The Journey to Success pillar, which is a developmental framework defining the District's shift to transformational, student-driven learning, aligns to the first focus area around learning, growth, and development, and the Backpack of Success Skills initiative.³⁴
- The Racial Equity pillar was built out in the District's Racial Equity Policy adopted by the Board.³⁵
- The Culture and Climate pillar is reflected across multiple focus areas and initiatives, including the increasing capacity and improving culture focus area and the Louisville Promise initiative.

Although the exam team identified certain parallels among the District's pillars, Vision 2020 focus areas, and initiatives highlighted in Vision 2020 In Action, the immediate connections between these components were not readily evident. It appeared that language for these strategy components evolved over time through transitions in leadership. The result is a wide array of outdated strategy language and lack of clarity about how these components connect and what is actively used to direct District strategy and decision-making.

Tracking Vision 2020 Implementation

Similar to the original Vision 2020 goals, the updated Vision 2020 In Action plan includes broad terminology for short-term metrics and long-term outcomes, such as "improved," "decreased," "% of," without specific numeric values attached.

There are no updates on plan implementation, metrics tracking, or goal achievement on the District's strategic plan webpage. The ARSI Division, while rich in District data and reports, also did not have published reports that directly corresponded to Vision 2020.

The exam team did not find evidence of the development of specific metrics not originally included in the plan. This suggests that, throughout the implementation period, the District relied solely on the metrics established in the initial Vision 2020 plan. As a result, no additional or new performance indicators were created or documented beyond those outlined at the outset. In interviews, stakeholders noted the pandemic effectively ended the Vision 2020 plan. No formal strategic planning process led by the JCPS administration has occurred since the conclusion of the plan in 2020.

³³ "[Vision 2020 In Action](https://5il.co/2g38s)." Jefferson County Public Schools. Retrieved January 5, 2026. <https://5il.co/2g38s>

³⁴ "[Journey to Success \(JTS\)](https://www.jefferson.kyschools.us/page/journey-to-success)." Jefferson County Public Schools. Retrieved January 5, 2026. <https://www.jefferson.kyschools.us/page/journey-to-success>

³⁵ "[District Racial Equity Policy](https://drive.google.com/file/d/1V8OvfkPrRb5LsWo85amqHhDpWMK-cSIP/view?usp=sharing)." Jefferson County Public Schools. Retrieved January 5, 2026. <https://drive.google.com/file/d/1V8OvfkPrRb5LsWo85amqHhDpWMK-cSIP/view?usp=sharing>

Goals and Guardrails

In the 2023-2024 school year, JCBE developed goals related to student achievement and safeguards that support the execution of such goals. Under the guidance of CGCS, JCBE adopted “Goals and Guardrails” to guide its work through 2030. The five stated goals are focused on academic readiness measures and literacy and numeracy assessment. The five stated guardrails are protections of safety, racial equity, inclusive decision-making, equitable resourcing, and appropriate testing.³⁶ The goals and guardrails are discussed in detail in **Chapter 2: JCPS Board of Education**. Stakeholders noted the future of Goals and Guardrails is uncertain, pending Board decisions.

Between 2020 and 2025, Goals and Guardrails have been the only formal set of District goals that JCBE and the administration regularly reported on and discussed during Board meetings.

Future of Strategic Planning

In fall 2025, Dr. Yearwood indicated in exam interviews his desire to begin a new strategic planning process in 2026. Additional District leaders confirmed these plans, pending a presentation to the Board in early 2026 to outline the planned process.

Recommendations	
1.7.a	JCPS should develop an updated strategic plan that includes a current mission, vision, values, priorities, goals, metrics, and action steps.
1.7.b	JCPS should publicize the updated strategic plan and align all web and print materials to align with updated information.

Continuous Improvement

The federal Every Student Succeeds Act (ESSA) and the Kentucky Department of Education (KDE) require schools and districts to regularly measure their progress, make plans for improvement, and be held accountable for student success. To fulfill this requirement, outlined in 703 KAR 5:225, districts develop CDIPs with the input of District stakeholders and a review of relevant data. KDE reviews CDIP submissions and monitors the implementation.

The 2025-26 JCPS CDIP references the mission, vision, and three pillars outlined in Vision 2020 as well as the established Goals and Guardrails. The plan highlights achievements in facilities improvement, student assignment overhaul, school safety model under the police department, academic innovation and adoption of common curriculum, graduation outcomes, and more. Areas for improvement focused on District financial stability, student achievement with a focus on reading growth, and school safety and strengthened partnerships. The CDIP states that “JCPS is transitioning from a governance framework centered on student outcomes and stakeholder decision-making to a focused district strategy that balances financial recovery,” and indicates the District is “transitioning from its Goals and Guardrails to a new chapter of growth and improvement.”³⁷ This shift in focus aligns with what JCPS leadership shared regarding a future strategic planning process and opportunity for Dr. Yearwood to shape the District’s strategic priorities.

³⁶ “[Goals & Guardrails: Jefferson County Board of Education](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d961aa6c-6589-4634-8ac8-78e1e5fd45b8/JCBOE_Goals__Guardrails_-_Annual_Targets__Int.pdf?disposition=inline).” Jefferson County Board of Education. Published November 12, 2024. Retrieved November 20, 2025. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d961aa6c-6589-4634-8ac8-78e1e5fd45b8/JCBOE_Goals__Guardrails_-_Annual_Targets__Int.pdf?disposition=inline

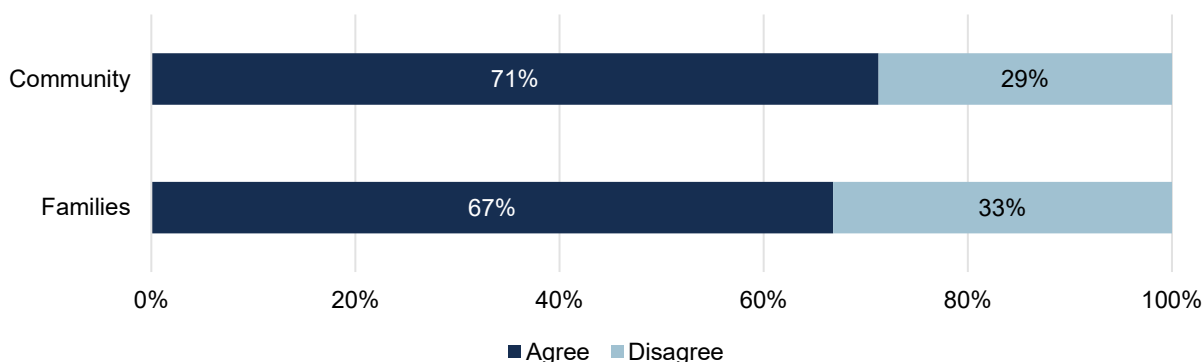
³⁷ “[Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view).” Jefferson County Public Schools. Retrieved January 7, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view>

Stakeholder Perceptions of District Decision Making and Priorities

Figure 18, Figure 19, and Figure 20 display survey respondent data for questions related to JCPS leadership decision-making, focus, and priorities. In the survey, leadership was defined as including both JCPS administration and the Board. A few notable takeaways from the survey data are listed below:

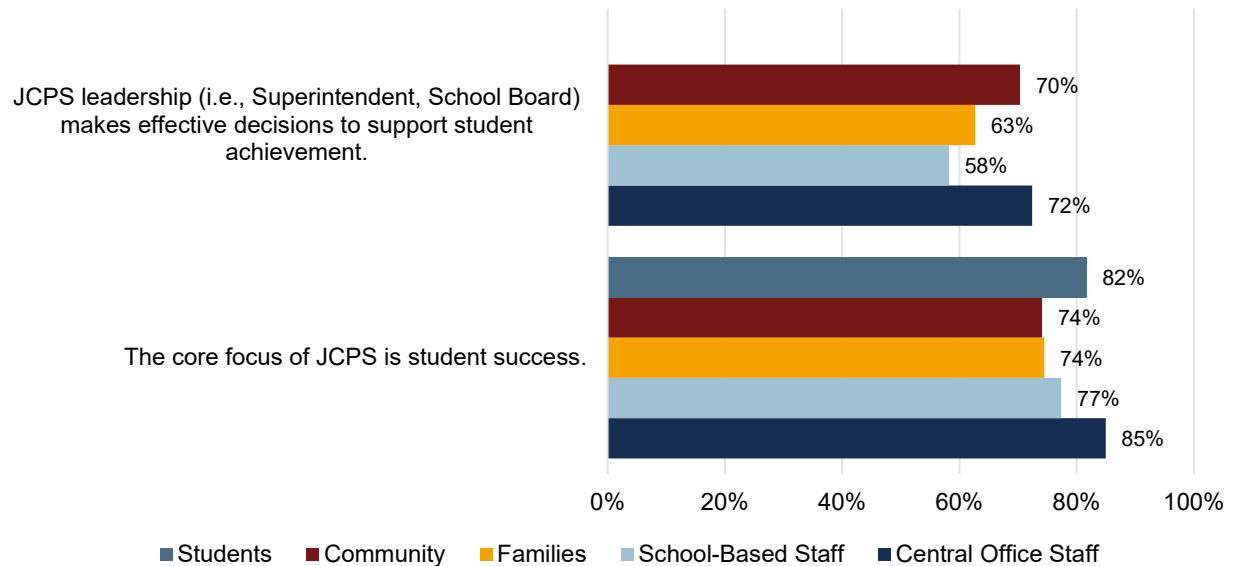
- Over two-thirds of JCPS families and community member survey respondents agreed that JCPS leadership does a good job serving students in the community.
- Central Office staff agreed that JCPS leadership makes effective decisions to support student achievement at a higher rate (72%) than school-based staff (58%).
- Community and family members agreed that the core focus of JCPS is student success at lower rates compared to other stakeholder groups.
- Central Office staff agreed that they understand JCPS leadership priorities at a higher rate (69%) compared to school-based staff (63%).
- Supervisors were more likely to report understanding JCPS leadership priorities compared to non-supervisors among both school-based and Central Office staff.

FIGURE 18: COMMUNITY AND FAMILY RESPONSES TO "OVERALL, JCPS LEADERSHIP DOES A GOOD JOB SERVING THE STUDENTS IN OUR COMMUNITY."



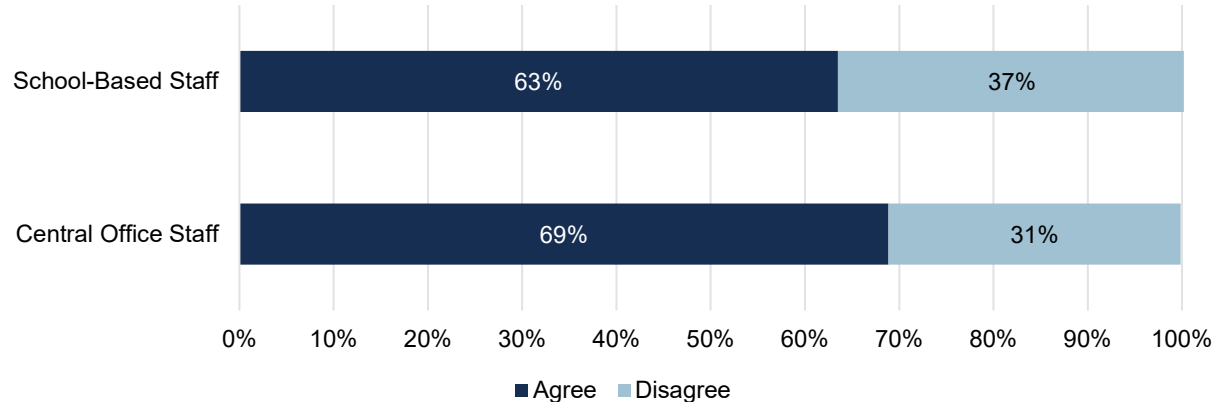
Source: Special Examination Survey.

FIGURE 19: STUDENT, COMMUNITY, FAMILY, AND STAFF PERCEPTIONS OF DISTRICT LEADERSHIP DECISION-MAKING AND PRIORITIES



Source: Special Examination Survey.

FIGURE 20: STAFF AGREEMENT WITH “I UNDERSTAND JEFFERSON COUNTY PUBLIC SCHOOLS LEADERSHIP’S PRIORITIES.”



Source: Special Examination Survey.

Despite the majority of staff survey respondents agreeing with the survey question statements related to decision-making and priorities, contrasting themes emerged in the survey open-ended responses:

- Central Office staff respondents cited questionable leadership practices, including favoritism, lack of accountability, and decision-making as areas for improvement.
- School-based staff survey respondents cited issues with Central Office leadership and decision-making, lack of transparency and inclusion, and a need for systematic accountability.

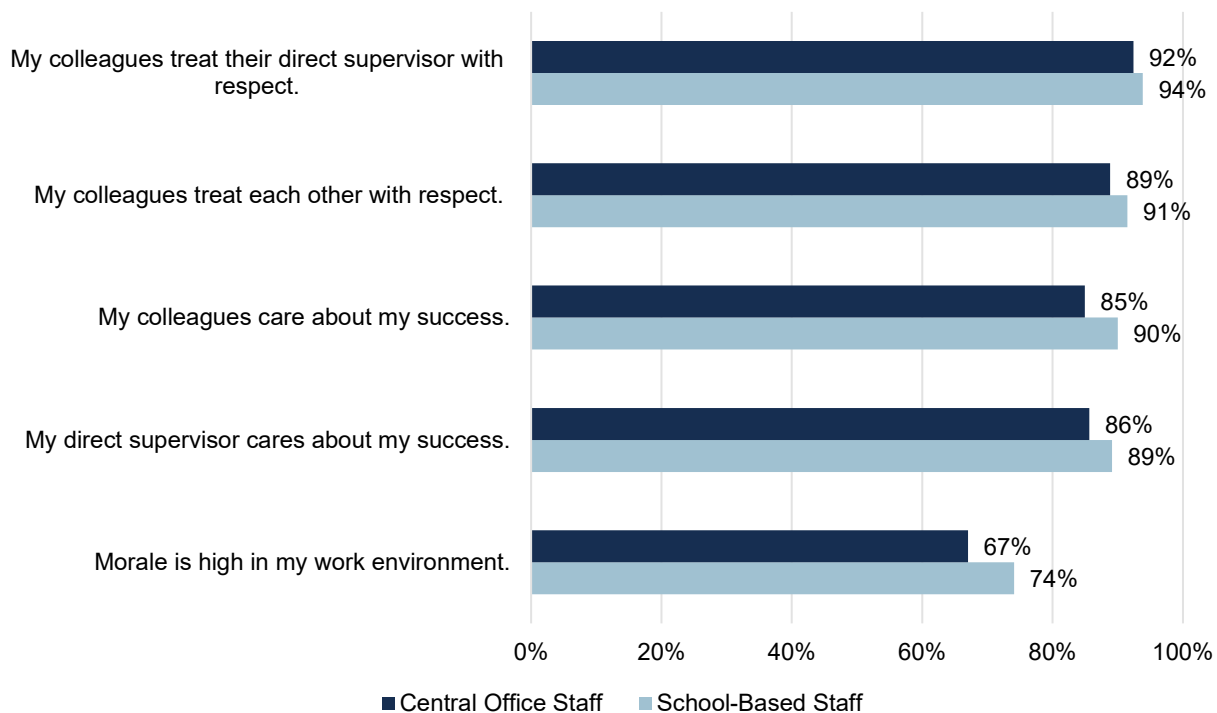
DISTRICT WORKPLACE CULTURE

Stakeholder Feedback

In the exam survey, Central Office and school-based staff were asked a series of questions about their workplace environment, role, and staff accountability. The results of those survey questions are displayed below.

As displayed in Figure 21, school-based staff agreed with workplace environment statements — including respect among both colleagues and supervisors, caring about individuals' success, and work environment morale — at a slightly higher rate than Central Office staff. Among these workplace environment statements, “Morale is high in my work environment” received the lowest rates of agreement among both Central Office (67%) and school-based staff (74%).

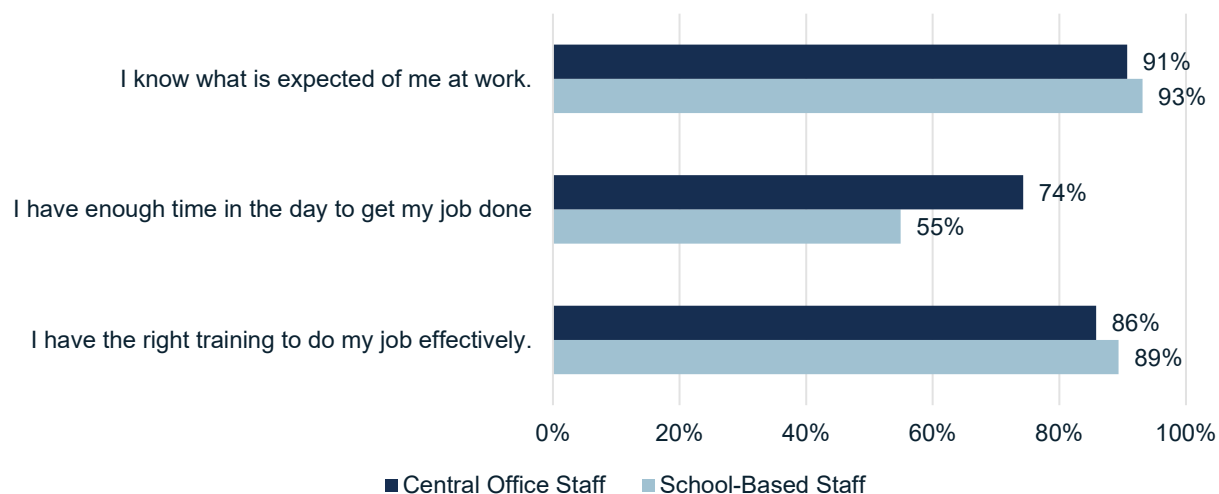
FIGURE 21: STAFF PERCEPTIONS OF WORKPLACE ENVIRONMENT



Source: Special Examination Survey.

As shown in Figure 22, over 85% of both school-based and Central Office staff agreed that they know what is expected of them at work and that they have the right training to do their job effectively. Only 55% of school-based staff agreed that they have enough time in the day to get their job done — an almost 20 percentage point gap compared to Central Office staff responses.

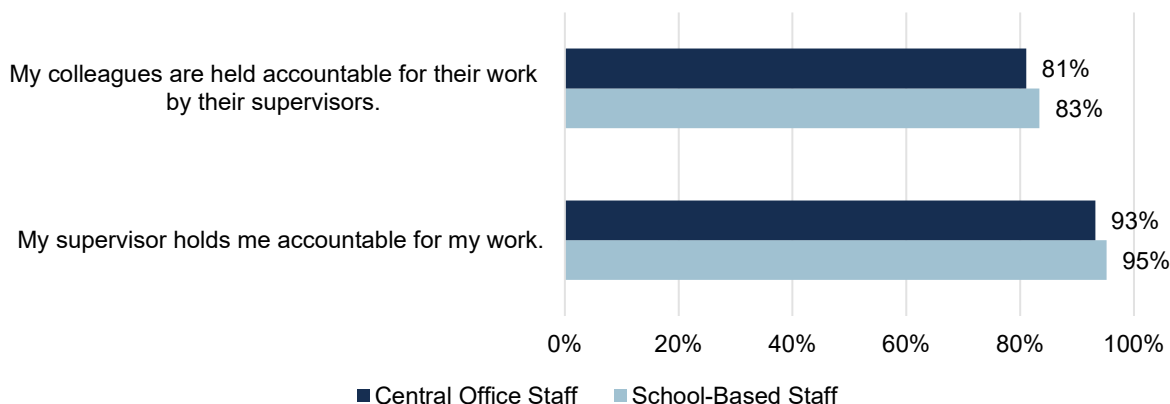
FIGURE 22: STAFF PERCEPTIONS OF ROLE AND ABILITY



Source: Special Examination Survey.

As shown in Figure 23, staff agreed they were held accountable for their work by their supervisors at a higher rate than they perceived their colleagues being held accountable for their work by their supervisors.

FIGURE 23: STAFF PERCEPTIONS OF ACCOUNTABILITY



Source: Special Examination Survey.

Fear of Retaliation

Observation	
1.8	A fear of retaliation exists in JCPS's workplace culture.

JCPS Policy 03.262 states, "No one shall retaliate against an employee or student because she/he submits a grievance which she/he believes to be true, assists or participates in an investigation, proceeding, or

hearing or opposes language or conduct that violates this policy. Upon the resolution of allegations, the Superintendent or their designee shall take steps to protect employees and students against retaliation.”³⁸

The Office of Compliance and Investigations (C&I) under the General Counsel “makes concerted efforts to ensure the district is free from discrimination, harassment, sexual harassment, sexual misconduct, and retaliation to facilitate an environment welcoming to all students, faculty, staff, vendors, and visitors can thrive.”³⁹ C&I publishes a discrimination and grievances handbook and related forms and provides a contact phone number for reporting.

However, despite a system of staffing, policy, procedures, and a handbook designed to prevent retaliation, a theme across the data collected was a fear of retaliation that exists in the District’s workplace culture. Examples are cited below.

- **2023 Transportation Audit:** In their Phase 1 Report for the 2023 transportation audit, Prismatic Services, Inc. noted their project was limited by the number of District staff interviewed who expressed concerns regarding confidentiality. Some of their interviewees expressed concerns about retaliation and were reluctant to share information. Prismatic noted the concerns expressed by JCPS staff were higher than usual, based on their experience with other districts.⁴⁰ Internal Audit shared that staff reported incidents of being coached by supervisors on responses to the transportation investigation and that some principals claimed being retaliated against for their responses during investigation meetings.
- **School-Based Staff Experiences:** In survey responses, some school-based staff reported witnessing administrators targeting certain teachers by levying a hostile work environment towards them and applying different performance measures to teachers. School-based staff described witnessing illegal activities and violations of federal workplace protection laws, including age discrimination. Some staff reported contract violations at their school and that staff were afraid to speak up due to fear of retaliation, affecting staff morale and school climate. School-based staff cited a need to address issues with administrators other than their school officials due to fear of retaliation.
- **Superintendent Pollio’s Leadership:** In interviews, Central Office administrators described a culture of fear under Superintendent Pollio’s leadership, where people were fearful of losing their job if they complained. Staff described the difficulty in having positive interactions with Superintendent Pollio. Staff also cited incidents of inappropriate and unprofessional interactions with cabinet leaders. Some staff described specific incidents of retaliation they experienced when they spoke up, including being barred from roles they claimed eligibility for, being investigated and hassled, and being removed from their job and placed in a different position in other parts of the District.

Superintendent Yearwood, in his response when asked about whether he had noticed a culture of fear of retaliation in JCPS, confirmed that he was aware of it but did not necessarily find it unusual for such a large organization. Superintendent Yearwood emphasized the importance of leadership that included open and courageous conversations so that negative issues do not fester. He also explained that he has expressed to staff that if retaliatory practices are identified, he wants to be involved immediately.

³⁸ “[Jefferson County Board of Education Policy 03.262 Harassment/Discrimination \(Classified\)](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended December 9, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

³⁹ “[Compliance & Investigations About Us](https://www.jefferson.kyschools.us/page/compliance-and-investigations).” Office of Compliance and Investigations. Jefferson County Public Schools. Retrieved April 13, 2026. <https://www.jefferson.kyschools.us/page/compliance-and-investigations>

⁴⁰ “School District of Jefferson County Public Schools: An Assessment of the Transportation Program and the Transportation Activities of August 9, 2023. Phase 1 Report.” Prismatic Services, Inc. Retrieved January 7, 2026. [PDF].

Recommendation	
1.8.a	The JCPS administration, led by the Superintendent, should continue to foster a culture of open communication and emphasize the District's policy and stance on retaliation through relevant communication channels, including leadership messaging to staff, handbooks, and staff orientations and trainings.

DISTRICT COMMUNICATIONS AND COMMUNITY RELATIONS

Communications Division

JCPS has a Communications and Community Relations Division led by a Chief Communications and Community Relations Officer who reports directly to the superintendent. The Communications and Community Relations Division manages both internal and external communications for the District, overseeing marketing, branding, event planning, social media, video production, and a print shop.

Internal Communication

Cabinet Communication

In Superintendent Yearwood's first six months, cabinet level staff reported increased communication and collaboration among leadership. The Superintendent shared that he intended to help break down silos by instituting a new agenda format for cabinet meetings in which each cabinet member shares three priorities and action items for the week and the entire group goes through day-to-day calendar events to increase awareness of initiatives and activities happening across JCPS divisions. Other efforts to increase communication include the Superintendent's invitation for assistant superintendents to begin joining cabinet meetings and the JCTA union president to attend cabinet once per month.

District Leadership Communication with Staff

The Communications Division sends out the JCPS Insider newsletter three times a week to all staff. Additionally, the Division uses texting, emailing, and social media to get news and information out to staff. The Communications Division shared that internal communications need improvement to make sure that employees have the information they need and want. The Communications Division does not have a dedicated internal communications staff person, but a communications coordinator role manages the staff newsletters in addition to social media. The District also cited student communication and multilingual communication to all stakeholders as other areas for improvement.

Staff Perceptions of Internal Communication

Themes regarding communication and transparency issues emerged in the survey open responses from staff. In focus groups and in the survey, staff reported that collaboration and communication have improved in the last few years, though remaining silos hinder collaboration and contribute to communication challenges. School-based staff survey respondents shared that protocol changes were not always effectively communicated to staff, such as changes to the weapons detection systems or the new cell phone policy.

External Communication

JCPS Approach to External Communications

Similar to the format and frequency in which they communicate with staff, the Communications Division sends out a family and community version of the JCPS Insider newsletter three days a week. Communications staff report that social media—including Facebook, X (Twitter), Instagram, and LinkedIn—have been useful methods for reaching stakeholders, showing strong engagement and participation from families and community members. Communications staff post videos and messaging on social media channels daily. The addition of a Spanish-language translator to the Communications team has allowed

JCPS to put out communications from the District in both English and Spanish, which is a goal for the team. The translator also attends community relations events and supports other Departments with translation, as needed.

Community Relations

Observation	
1.9	Community relations activities occur across multiple divisions in JCPS. Lack of centralized community partner management may be associated with resource inefficiencies and creates a risk of failing to maintain strong relationships with partners.

The role of the Communications Division as it relates to community relations is primarily focused on event management and related logistics. The Communications Division organizes community events, conducting the marketing for the events and managing the events on-site. The development and management of partnerships with community organizations is a function of the General Counsel's office, the Chief of Staff's office, and the Academies of Louisville, which conduct their community relations independent of the Communications Division. The decentralized nature of community relations across multiple divisions and staff may be a risk to strong partner relationships and use of staff resources, resulting in siloing and gaps in staff communication. A customer relationship management (CRM) system, or similar platform, that can catalog community partners, organization point of contacts, District partnerships, and touchpoints (such as events, donations, etc.) could improve communications, mitigate risk, and increase collaboration and efficiency.

Recommendation	
1.9.a	JCPS should adopt a customer relationship management (CRM) system to manage community partner relations Districtwide.

Relationship with the Media

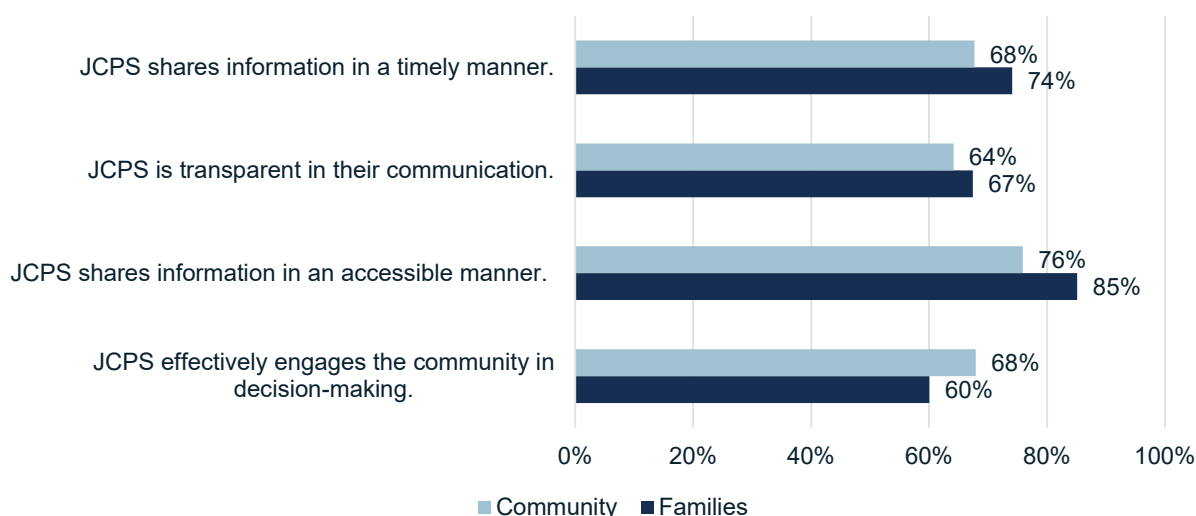
According to Communications staff, JCPS has strong relationships with local media, which enables it to have frequent and effective dissemination of information. Communications staff reported often receiving dozens of media requests daily through phone calls or emails from reporters and spend a great deal of time responding to media inquiries, gathering the necessary information to answer their questions, and be responsive in a timely manner. Most of the Communications team are former reporters and provide media training for any staff who need it. The Communications team sends out event notices to the media every Sunday showcasing District and school events for the week and finds that local media attend most of them.

In focus groups and survey responses, stakeholders — including District leaders, staff, families, and community members — discussed issues related to the public perception of JCPS. Stakeholders felt that negative JCPS stories dominated the media and not enough attention was given to positive stories and good news coming out of the District. The Communications Office shared that they are working on more proactive communications to help increase positive perceptions of the District. One of the strategies used by the Communications Office is to share more student-focused stories by highlighting student experiences and achievements in areas such as academics and athletics.

Stakeholder Perceptions of District Communications with Families, Community, and the Public At-Large

As shown in Figure 24, community and family stakeholders who responded to the survey had overall positive perceptions of JCPS communications and information sharing, with family members agreeing that information is timely, transparent, and accessible at higher rates than community members.

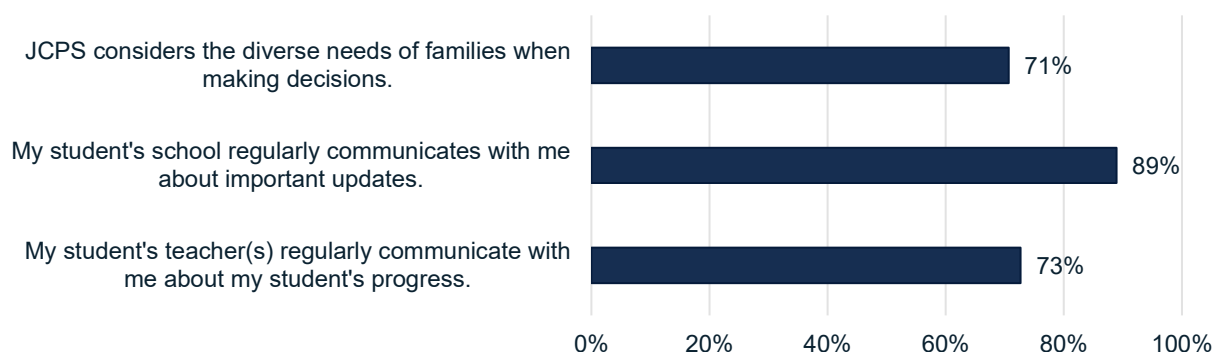
FIGURE 24: COMMUNITY AND FAMILY PERCEPTIONS OF COMMUNICATION AND INFORMATION SHARING



Source: Special Examination Survey.

As shown in Figure 25, overall, families agree that their students' schools regularly communicate with them about important updates. In addition, 73% of families agreed that their students' teachers regularly communicate with them about their students' progress. 71% of families also agreed that JCPS considers the diverse needs of families when making decisions.

FIGURE 25: FAMILY PERCEPTIONS OF SCHOOL COMMUNICATION AND DECISION-MAKING



Source: Special Examination Survey.

In interviews and focus groups, stakeholders across all groups cited communication gaps between JCPS and families as well as the public at-large. Specific issues referenced included lack of communication from the Board about the budget deficits; delayed or missing communication regarding school incidents, such as emergencies or lockdowns; disjointed notifications among schools and District administrators due to the variety of methods used (text, email, app notifications); and insufficient advance notice or lack of context about events and school activities.

Family member survey responses indicated mixed feedback on communication. Family respondents cited appreciation for tools like Google Classroom and weekly newsletters for staying current and critiqued a new tool called Rooms App for lack of effectiveness. Some parents shared they felt they had not been adequately informed about missing assignments or grade issues, nor the transportation crisis. Responses indicated demand for more streamlined, centralized communication methods. JCPS is encouraged to continue and grow its communication efforts with these issues in mind.

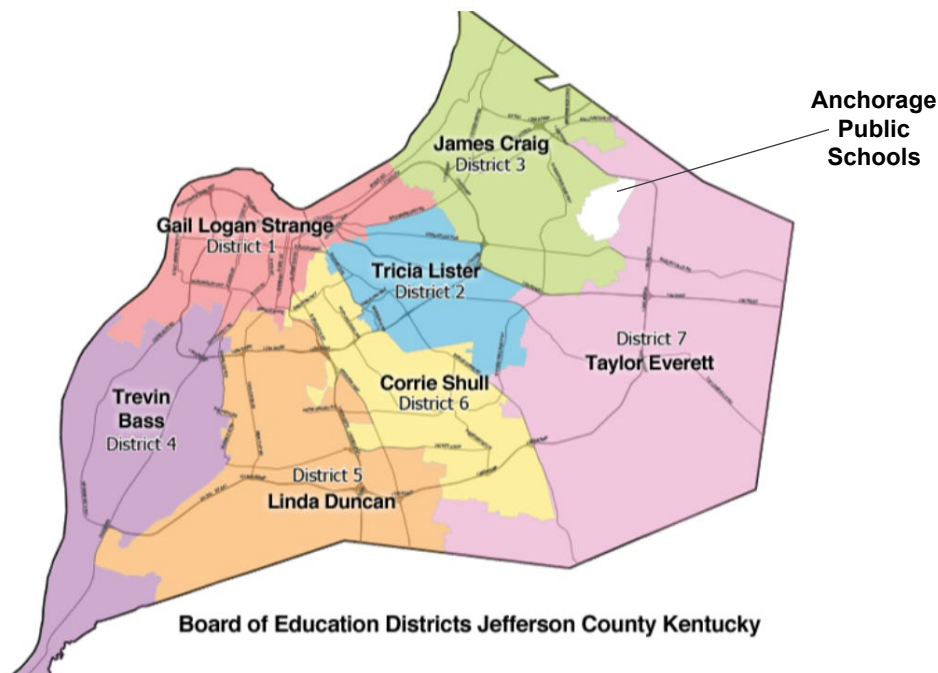
CHAPTER 2: JCPS BOARD OF EDUCATION

The Jefferson County Board of Education (JCBE) serves as the collective governing body for the Jefferson County Public School (JCPS) District. JCBE (further referred to as the “Board”) oversees the development, operation, and improvement of JCPS.⁴¹ The superintendent of schools, appointed by the Board, acts as the District’s chief executive.⁴² This governance structure was established with the court-ordered merger of the Louisville and Jefferson County school districts, effective April 1, 1975.⁴³

KRS 160.200 and 160.210 are Kentucky laws that establish how school board elections are conducted and how districts are divided. KRS 160.210 requires JCPS to be divided into seven divisions, each as equal in population as possible, with Board members elected from those divisions (further referred to as Board “districts” in this chapter). Towards the end of this examination, the General Assembly passed Senate Bills 1 and 4 during its 2026 regular session. These bills change the number of districts within JCPS and the makeup, structure, and responsibilities of the Board. Even so, essentially all the feedback in this chapter can assist the new Board in performing its duties on behalf of all stakeholders within JCPS once the updated Board structure is in place.

The Board is currently comprised of seven nonpartisan elected members who serve four-year terms through a general election. Board members reside within and represent one of seven designated districts within the geographic boundary of Jefferson County, except for Anchorage Independent Schools whose municipal boundary, and therefore the governance and operations, is recognized as independent of Jefferson County by the Commonwealth of Kentucky.

FIGURE 26: JEFFERSON COUNTY BOARD OF EDUCATION DISTRICTS



Source: Jefferson County Public Schools website.

⁴¹ “[Jefferson County Board of Education](https://www.jefferson.kyschools.us/page/board-of-education).” Jefferson County Public Schools. Retrieved January 26, 2026. <https://www.jefferson.kyschools.us/page/board-of-education>

⁴² “[Jefferson County Board of Education Policy 01.11 General Powers and Duties of the Board](#).” Jefferson County Board of Education Policy Manual. Adopted/Amended July 29, 2025. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁴³ “[Kentucky's Independent School Districts: A Primer](#).” Legislative Research Commission. Published September 15, 2015. Retrieved January 27, 2026. <https://apps.legislature.ky.gov/lrc/publications/ResearchReports/RR415.pdf>

Note that not all findings and recommendations pertaining to the Board are found within this chapter alone. Many other chapters in this report discuss specific Board-pertinent topics and outline additional recommendations for the Board to consider in performing its duties.

BOARD GOVERNANCE AND OPERATIONS

School boards provide strategic leadership for school districts through governance, which includes setting direction, establishing policies, monitoring performance, and ensuring accountability. Elected board members represent and advocate for their communities by shaping policy. The Board governs by approving policies that guide the superintendent and staff in managing daily operations of the District.⁴⁴

School boards govern public school systems locally through one of four generally accepted models of governance: operational, managerial, traditional, or policy.⁴⁵ A review of the JCPS Board policies and procedures as well as the District's organizational structure suggests the *policy* governance model is most closely aligned to the framework through which the Board's decisions are made and implemented.⁴⁶

In this policy model, the School Board:

- Establishes the district's policies, governance procedures, and goals.
- Manages and evaluates the superintendent who has the responsibility of determining the implementation process for the District to achieve the goals and objectives set by the Board.
- Represents the needs and interests of each elected member's respective constituencies through the policy-making process.
- May choose to convene committees and advisories to support the development of certain aspects of the Board's work; however, the entities do not have decision-making authority outside of the full Board.⁴⁷

Board Policy 01.11 identifies the Board's chief concern as "the development and operation of JCPS in furthering the goals of an individual quality education."⁴⁸ Additional responsibilities include the formation of district policies, appointment and evaluation of the superintendent, receiving reports on the District progress from the superintendent, promoting and supporting high-quality instructional programming, setting general tax rates within the approved limits, examining and approving the District's annual budget, and approving purchases related to building and maintaining facilities.⁴⁹ The Board enacts their collective responsibility as a governing body through public meetings.

⁴⁴ "Jefferson County Board of Education Policy 01.11 General Powers and Duties of the Board." Jefferson County Board of Education Policy Manual. Adopted/Amended July 29, 2025. Retrieved January 23, 2026.

<https://policy.ksba.org/Chapter.aspx?distid=56>

⁴⁵ Ford, Michael R., & Ihrke, Douglas M. "Understanding School Boards and Their Use of Different Models of Governance." Published November 1, 2016. Retrieved January 23, 2026.

<https://jpna.org/index.php/jpna/article/view/53>

⁴⁶ "Organizational Charts." Jefferson County Public Schools. Published January 20, 2026. Retrieved January 23, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/efd237de-7327-48ff-89b8-9958635be2cd/BOARD-APPROVED-JANUARY-20%2C-2026.pdf?disposition=inline

⁴⁷ Ford, Michael R., & Ihrke, Douglas M. "Understanding School Boards and Their Use of Different Models of Governance." Published November 1, 2016. Retrieved January 23, 2026.

<https://jpna.org/index.php/jpna/article/view/53>

⁴⁸ "Jefferson County Board of Education Policy 01.11 General Powers and Duties of the Board." Jefferson County Board of Education Policy Manual. Adopted/Amended July 29, 2025. Retrieved January 23, 2026.

<https://policy.ksba.org/Chapter.aspx?distid=56>

⁴⁹ Ibid.

Board Meeting Frequency and Accessibility

Observation	
2.1	Members of the Board expressed concerns about the District's irregular dissemination of final presentation materials prior to public meetings.

All JCBE and related committee meetings are a function of public policy and public business. As a result, these meetings must adhere to the requirements of the Open Meetings Act outlined in KRS 61.800 to 61.850 and 61.991. JCPS is one of 123 school districts that use the Kentucky School Board Association's (KSBA) eMeeting paperless service for school boards, councils, and public agencies.⁵⁰ The service fee for Boards that meet one time per month is \$2,750 in the first year and \$1,100 in subsequent years. The JCPS Board and committee meeting materials are available through the KSBA eMeeting portal which is linked through the JCBE webpage on the JCPS website.⁵¹ All Board meeting schedules, recorded broadcasts, and meeting materials are available for public consumption through the JCBE webpage.

The Board posts an annual Regular Meeting schedule, which includes both "Business Meeting" and "Work Session Meeting" types.

- Regular Business Meetings are the Board's formal decision-making sessions where members vote on policies, budgets, and other official actions.
- Regular Work Session Meetings are discussion-focused sessions used to review information, ask questions, and explore issues without typically taking action.⁵² They also include a Consent Calendar where policies, MOAs, contracts, and matters necessary to manage the District are approved.

In 2025, the schedule included 17 meetings from January to December.⁵³ This number exceeds the minimum requirement of "at least one (1) regular business meeting each month" according to Board Policy 01.42.⁵⁴ Scheduled meetings are held in person, starting at 6:00 PM, in the Stewart Auditorium at the VanHoose Education Center located at 3332 Newburg Road, Louisville, KY. Board members are provided the option to attend scheduled in-person meetings by "video teleconference" so long as the member is visible on camera at all times.⁵⁵ All in-person meetings are broadcast live through video teleconference and with American Sign Language (ASL) interpreters for additional public accessibility. The broadcasts are both live streamed and made available through the Board's YouTube channel for review after the meeting's conclusion.⁵⁶

All JCBE meetings reviewed were well organized with agenda items supported by the necessary documentation available through the KSBA portal. Board meetings agendas are posted at least 24 hours in advance as required by the Kentucky Open Meetings Act. The Assistant Secretary to the Board is responsible for uploading official meeting documentation to the eMeeting portal. Additionally, this role is responsible for the preparation of printed materials for Board meetings, maintenance of official records

⁵⁰ "eMeeting." Kentucky School Boards Association. Retrieved January 23, 2026.

<https://www.ksba.org/eMeeting.aspx>

⁵¹ "Jefferson County Board of Education." Jefferson County Public Schools. Retrieved January 23, 2026.

<https://www.jefferson.kyschools.us/page/board-of-education>

⁵² "Jefferson County Board of Education Policy 01.45 Board Meeting Agenda." Kentucky School Boards Association. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁵³ "2025 Regular Meeting Schedule." Jefferson County Board of Education. Published December 3, 2024. Retrieved January 23, 2026. https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/4298/JCPS/5076449/2025_Board_Meeting_Schedule_Approved_12-03-2024.pdf

⁵⁴ "Jefferson County Board of Education Policy 01.42 Powers and Duties of the Board of Education: Regular Board Meetings." Jefferson County Board of Education Policy Manual. Adopted/Amended October 25, 2022. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁵⁵ Ibid.

⁵⁶ "Jefferson County Board of Education." YouTube. Published May 9, 2018. Retrieved January 23, 2026. <https://www.youtube.com/channel/UCJCC8xo7s9vxfZiV5ZoocQ>

(including the recording of minutes), internal staff support to ensure Board members have all information in a timely manner, scheduled meeting support, and additional requests for information.⁵⁷ This role currently reports to the Chief of Staff, who is also the primary contact for Board members' questions between scheduled meetings.

Communication and documentation are integral to efficient Board operations and reinforcing transparency and trust with public business. Board members and JCPS Cabinet noted they frequently communicate through email, text messages, phone calls, and 1:1 meetings to ask and answer questions about key issues. During Superintendent Pollio's tenure, JCPS leadership added a structured process for documenting and responding to Board questions before scheduled meetings. When Board members ask questions to JCPS staff prior to scheduled public meetings, the District will collect those questions and respond internally through a shared Google document. Once the document is finalized, it is posted to the relevant public meeting agenda as a dated "Board Q&A" for transparency. This strategy streamlined the District staff's process of responding to Board member questions outside of public meetings and reduced the time spent discussing certain agenda items during public meetings. JCPS staff and Board members generally expressed appreciation for the use and availability of this process to centralize questions before meetings. However, some senior JCPS staff noted in interviews that it was not clear whether all Board member questions were added to the "Board Q&A" document or what criteria were used to determine what is answered publicly in the posted document, and what is answered in direct 1:1 communication outside of public meetings. Establishing clear and consistent guidelines for these communications is critical to maintaining public trust and ensuring the Board's processes remain transparent and accountable.

Recommendation	
2.1.a	The District should develop and communicate transparent guidelines to the Board for determining which Board member questions and responses are shared publicly (e.g., through the eMeeting portal or Board documentation) and which are addressed privately.

Board Meeting Facilitation and Time Use

Findings	
2.2	A significant portion of Board meeting time is allocated to District-led presentations and discussions. The structure limits opportunities for Board members to engage in meaningful discussion on high-impact agenda items.
2.3	The Board has relied on a large consent agenda to increase meeting efficiency, which may be reducing public transparency and thorough Board review of items that impact the District's budget.

The exam team examined materials from all 17 planned public Board meetings for 2025 to assess how agendas were managed and how meeting time was distributed across different topics.⁵⁸

- A review of the recorded meetings confirmed that, in accordance with the procedures of Board Policy 01.411, the Board Chair presided over all scheduled meetings in 2025, consistently followed the approved agenda, and allowed all Board members to participate and gain closure on agenda items before moving to the next matter at hand.⁵⁹

⁵⁷ "[Assistant Secretary to the Board Job Description](#)." Jefferson County Public Schools. Published July 1, 2019. Retrieved January 23, 2026. <https://drive.google.com/file/d/12eQG1Cc-VNKiRqG7bDWQgBkIt9R8Auad/view>

⁵⁸ "[Jefferson County Board Meetings](#)." Kentucky School Boards Association. Retrieved January 23, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

⁵⁹ "[Jefferson County Board of Education Policy 01.411 Powers and Duties of the Board of Education: Duties and Responsibilities of Chairperson and Vice-Chairperson](#)." Jefferson County Board of Education Policy Manual. Adopted/Amended January 5, 2021. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

- In accordance with Board Policy 01.413, the District's Chief Financial Officer (CFO), acting as Board Treasurer, attended meetings and reported on financial matters.⁶⁰
- In accordance with Board Policy 01.412, the Superintendent attended all meetings and served as the Board Secretary.⁶¹
- Other JCPS Cabinet members were observed attending meetings to ensure all operations run smoothly and questions can be answered during public meetings.
- Overall, JCBE members, District staff, and constituents during public comment conducted business in a respectful, orderly, and collegial manner. Those asked to address or present to the Board are treated with the same respect.

In both interviews and public meetings, several Board and JCPS Cabinet members expressed their intention to limit scheduled meetings to no longer than two hours. Additionally, District staff and Board members reported that meetings prior to 2025 frequently exceeded two hours and conveyed a desire for future sessions to be shorter and more focused on student-impacting work more than procedural matters and extensive discussion. However, an analysis of the seventeen regularly scheduled Board meetings in 2025 revealed durations ranging from one to four hours (with most meetings lasting two hours or more), suggesting that the aim to streamline and shorten public board meetings has not yet been achieved.

Regular Meeting agendas followed the format outlined in Board Policy 01.45, which includes the following topics:⁶²

1. Moment of Silence
2. The Pledge of Allegiance
3. Recitation of the District's Vision Statement
4. District Recognitions and Resolutions
5. Recommendation for Approval of Meeting Agenda
6. Recommendation for Approval of Minutes of Previous Meeting
7. Superintendent's Report
8. Student Outcomes-Focused Governance Update
9. Persons Requesting to Address the Board on Action Items or Consent Calendar Items to be Voted Upon Separately at Board Member Request
10. Action Items
11. Information Items
12. Consent Calendar
13. Board Planning Calendar
14. Committee Reports
15. Persons Requesting to Address the Board (If Necessary)
16. Executive Session (If Necessary)
17. Action Item (If Necessary)
18. Adjournment

The exam team reviewed 1,731 minutes of publicly available recordings from the 2025 Regular Board Meetings.⁶³ Figure 27 shows the analysis results:

⁶⁰ "[Jefferson County Board of Education Policy 01.411 Powers and Duties of the Board of Education: Duties and Responsibilities of The Treasurer.](#)" Jefferson County Board of Education Policy Manual. Adopted/Amended January 5, 2021. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁶¹ "[Jefferson County Board of Education Policy 01.411 Powers and Duties of the Board of Education: Duties and Responsibilities of The Secretary.](#)" Jefferson County Board of Education Policy Manual. Adopted/Amended January 5, 2021. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁶² "[Jefferson County Board of Education Policy 01.45 Powers and Duties of the Board of Education: Board Meeting Agenda.](#)" Jefferson County Board of Education Policy Manual. Adopted/Amended October 25, 2022. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁶³ "[Jefferson County Board of Education.](#)" YouTube. Published May 9, 2018. Retrieved January 27, 2026. <https://www.youtube.com/channel/UCJCC8xo7s9vxfZiV5ZoocQ>

FIGURE 27: TOTAL AND PERCENTAGE OF JEFFERSON COUNTY BOARD OF EDUCATION MEETING MINUTES DEDICATED TO SPECIFIC AGENDA TOPICS, 2025

2025 REGULAR BOARD MEETING AGENDA TOPICS	Total Minutes	Total Minutes (%)
Procedural Operations (Motions, Voting, Consent Agenda, Committee Reports, etc.)	230	13%
Public Comment	244	14%
Presentations (Superintendent Items, Facilities, Finance, Human Resources, Academics, Board Self-Evaluation, etc.)	426	25%
Discussions Related to Other Presentations	412	24%
Goals and Guardrails Presentations	180	10%
Goals and Guardrails Discussions	239	14%
Total for 2025 Meetings	1731	100%

Source: Jefferson County Board of Education YouTube and Kentucky School Board Association website.

The observed meetings were efficient and focused, with procedural matters making up approximately 13% of meeting time in 2025. However, little time was spent on public discussion of “Consent Agenda” items, which primarily consisted of meeting minutes, routine personnel actions, standard contracts, budget amendments, grant approvals, and recurring purchasing actions. Governing bodies use “consent agendas” to group what they believe to be routine, non-controversial, and procedural items into a single agenda item, allowing them to be approved in one motion without discussion. While JCPS Board Policy 01.45 allows routine decisions to be approved efficiently, large consent agendas may reduce transparency and limit both public understanding and thorough Board review.⁶⁴ Although any Board member can request discussion on specific items, lengthy agendas may discourage such deliberation. Topics or issues may not receive the appropriate amount of attention or discussion due to an effort to work through a lengthy agenda in a quicker, but not necessarily more effective, manner. And considering that many of the items shuffled into the Consent Agenda involve district finances at the same time that JCPS now finds itself in a financial crisis, it may be worthwhile to spend additional, purposeful time on such items.

Approximately 14% of meeting time in 2025 was spent on public comment. In instances where public comment occurred, time was appropriately designated for commentary pertaining to Board policies prior to any votes, with additional opportunities for general comments at the conclusion of the meeting if requested through proper channels before the scheduled session.⁶⁵ The group included individuals who either spoke during public comment or showed support for other speakers, while many simply attended to listen. Major policy topics attracted larger crowds, and representation from union leadership and membership who chose to speak. Audience members were observed applauding at times to show agreement with a speaker’s remarks. However, even when there were differences of opinion between a speaker and the public, there were never any observable instances of disrespect or breaches of decorum.

One procedural operation at Regular Board meetings includes the District communications staff leading the *District Recognitions and Resolutions* agenda item designed to share positive stories about District staff and students to the wider community and the media. Kentucky School Board Association (KSBA) guidance on Board meetings notes that “[w]hile it’s fine to set aside time for student and staff recognitions, it sends a totally different message when the board is willing to devote a portion of its time to watching and listening to students demonstrate what they are accomplishing.”⁶⁶ No examples of student-led presentations to the

⁶⁴ “Jefferson County Board of Education.” YouTube. Published May 9, 2018. Retrieved January 27, 2026. <https://www.youtube.com/channel/UCJCC8xo7s9vxfFZIV5ZoocQ>

⁶⁵ “Jefferson County Board of Education Policy 01.421 Powers and Duties of the Board of Education: Public Participation in Open Meetings.” Jefferson County Board of Education Policy Manual. Adopted/Amended July 19, 2022. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁶⁶ “School Board Leadership Guide: A Resource for Kentucky’s School Board Members.” Kentucky School Boards Association. Retrieved January 27, 2026. <https://filecabinet7.eschoolview.com/1365B58C-F95F-4E75-94BB-A29D9A94F1C7/206b3c0a-de97-4db9-8621-6745f76628b1.pdf>

Board were identified during the 2025 meetings. Rather, all presentations and discussions were led by District administrators, vendors, or program leaders reporting on the topic at hand.

Compared to the 13% spent on procedural matters, a larger portion of meeting time was dedicated to student-outcome focused governance (24%), particularly through Goals and Guardrails presentations and discussions led by District staff. This was an intentional goal stated by the Board during interviews — that is, to spend less time on procedural operations in meetings. Nearly half of public meeting minutes (49%), meanwhile, were allocated to District staff presentations and related discussions concerning the Superintendent’s reports and major operational topics such as staffing, transportation, finance, and academics. While the Board is making progress toward focusing more on student outcomes than procedures, almost half of each public meeting still centers on presentations or conversations about District operations, functions, and policies. To prioritize critical items at public meetings, lengthy presentations and detailed discussions about District policies and procedures should be referred to the Board Policy committee for deeper review, as discussed later in this chapter.

Recommendations	
2.2.a	The Board should reallocate meeting time to focus more on student outcomes and less on lengthy policy discussions and presentations which can be referred to the Board Policy committee for deeper review.
2.2.b	The Board should integrate student-led presentations and demonstrations of their learning into public meetings.
2.3.a	The Board should limit the consent agenda to routine items and elevate higher impact actions for discussion on the regular agenda to strengthen transparency and Board oversight.

BOARD OVERSIGHT AND DECISION-MAKING

The Board has various mechanisms for oversight and accountability. However, interaction and engagement with community stakeholders is a critical aspect of governance, as it ensures that policies reflect broader educational and societal standards. Effective policy implementation relies on stakeholder feedback, including input from local businesses and educational organizations, to promote transparency and responsiveness.

Stakeholder Perception of Board Governance

Observation	
2.4	Stakeholders reported concerns about limited transparency and lack of input on Board decisions.

During both public meetings and focus groups, stakeholders highlighted the need for better communication between the Board and the community. Many parents, frustrated by learning about important issues such as budget cuts and policy changes from media sources instead of directly from the District or their student’s school, called for more regular, transparent, and detailed updates, especially regarding decisions that affect schools, program reductions, and fund allocation.

Parents acknowledged the challenging nature of the Board’s responsibilities but felt transparency and prioritization of the broader community’s interests were lacking, particularly amid recent financial difficulties. Themes of equity and inclusion came up repeatedly, as families showed concern for fair treatment and support for diverse student populations. Parents advocated for stronger systems to address disparities, including more transparent discipline policies, enforcement of those policies consistently within schools, improved school-level responsiveness to students’ needs, and proactive measures to prevent violence and bullying.

Principals, during focus groups and site visits, described varying levels of engagement from Board members. While some Board members actively participated in events and school visits, others did not

respond to invitations or engage with certain school sites at all. In interviews, Board members admitted that issues remain around public transparency, trust, effective communication, and shared understanding of governance processes. They noted inconsistent interactions and limited clarity in decision-making, leading to greater mistrust among stakeholders. District staff expressed concern that negative media coverage often overshadows the positive initiatives the Board tries to highlight in public forums and communications.

Concerns about Board governance and policies appeared throughout interviews, focus groups, and site visits. Parents questioned how the Board managed financial challenges in recent years, pointing to insufficient detail on budget shortfalls and spending reductions. The Board's perceived lack of preparedness for the 2025 financial crisis suggested inadequate internal communication and planning, prompting parents to call for greater foresight and coordination. Some stakeholders also advocated for greater community involvement in Board elections and key decisions, such as selecting the superintendent, as discussed later in this chapter.

Recommendation	
2.4.a	The Board should improve mechanisms for two-way communication with District families and community members, with a particular focus on ensuring meaningful engagement and timely information sharing around decision-making processes.

Board Committees

Observations	
2.5	The Board of Education webpage on the JCPS website does not list all active Board committees or the participating members.
2.6	The Board committee meeting minutes posted to the Kentucky School Boards Association (KSBA) portal are inconsistently formatted and not available for public review.

The Board has the authority to establish committees when deemed necessary to serve in an advisory capacity; however, committees may not act on behalf of the Board.⁶⁷ Interviews with Board members confirmed active committees make recommendations to the full Board, but do not make policy decisions on behalf of the Board.

Committee meetings are subject to the Kentucky Open Meetings Laws KRS 61.800 to 61.850 and 61.991. Meeting agendas and the associated documentation are posted to the eMeeting portal through KSBA for public accessibility.⁶⁸ Interviews with District staff confirmed that committee chairs are responsible for documenting and uploading the meeting minutes for all public meetings. Because the Assistant Secretary to the Board is only responsible for the Board meeting documentation, and not committees, the minutes and documentation for related committee work are managed and uploaded to the eMeeting portal by the secretaries assigned to each committee chair. In practice, some committees provide only agendas or limited details, while others share comprehensive minutes. This inconsistency impacts the level of information available to the public. Without up-to-date and complete meeting meetings and documentation, it is difficult for stakeholders to fully understand committee actions, which, in turn, undermines overall transparency and public trust in the governance process.

The General Counsel's Office provided the exam team with comprehensive information regarding the frequency of subcommittee meetings, which could not be found on the Board site page of the District's website.⁶⁹ Some committees convene on an as-needed basis, while others adhere to predetermined

⁶⁷ "[Jefferson County Board of Education Policy 01.22 Board Committees](#)," JCPS Board Policy Manual.

Adopted/Amended January 5, 2021. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁶⁸ "[Jefferson County Committee Meetings](#)," Kentucky School Boards Association. Retrieved January 23, 2026.

<https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

⁶⁹ "[Jefferson County Board of Education](#)," Jefferson County Public Schools. Retrieved January 27, 2026.

<https://www.jefferson.kyschools.us/page/board-of-education>

schedules. In addition to its primary policy committee, the Board supervises various standing committees mandated by state regulations or Board policy, such as the School Calendar Committee, Local Facilities Planning Committee, Student Support and Behavior Intervention Handbook (SSBIH) Committee, and the Advisory Council for Racial Equity (ACRE). The Board also establishes ad hoc committees to address specific priorities, including the 2025 Revenue Task Force for financial matters and strategic initiatives and the Superintendent Search Committee for superintendent recruitment in 2025. These groups provide specialized oversight and recommendations on complex issues requiring dedicated attention.

The District's General Counsel's Office confirmed there were eight active Board committees that function as an advisory to the decision-making of the Board:

FIGURE 28: ACTIVE JEFFERSON COUNTY BOARD OF EDUCATION COMMITTEES IN FALL 2025

COMMITTEE	Includes Board Member(s)	Most Recent Meeting as of December 31, 2025	Meeting Frequency Average Reported by the District	Required by Policy, Law or Statute?
School Calendar Committee	Yes	January 23, 2025	2-3x per year	Yes – KRS 158.070
Local Facilities Planning Committee	Yes	November 25, 2024	2-4x per year	Yes – 702 KAR 4:180
Advisory Council for Racial Equity (ACRE)	No	December 16, 2025	4-6x per year	Yes - Board Policy 09.131
Student Support and Behavior Intervention Handbook (SSBIH) Review Committee	Yes	March 11, 2025	4-6x per year	Yes – Board Policy 09.438 and KRS 158.148
Board Policy Committee	Yes	November 10, 2025	8x per year	No
Audit and Risk Management Advisory Committee (ARMAC)	No	October 29, 2025	5-10x per year	No
Exceptional Child Education (ECE) Advisory Committee	No	October 16, 2025	3-4x per year	No
2025 Revenue Advisory Task Force	Yes	October 27, 2025	Temporary	No

Source: Kentucky School Boards Association website and data provided by Jefferson County Public Schools.

The active committees provided by the General Counsel's Office in Figure 28 are not the same as the committees listed on the Board of Education webpage on the JCPS website. The website defines the purpose and membership for six Board committees: Educator Quality Oversight Committee, Local Planning Committee, LGBTQ Advisory Committee, Student Assignment Review Committee, School Calendar Committee, and the Student Progression, Promotion, and Grading Committee.⁷⁰ Only the School Calendar Committee and the Student Progression, Promotion, and Grading Committee from this list were confirmed as active in the fall of 2025 by the District.

When asked, District staff acknowledged they are responsible for updating that webpage, but as of January 2026, the page has not been updated to reflect the eight active committees or the Board members assigned to lead or support the work in each respective committee. During the November 18, 2025 Work Session

⁷⁰ “Jefferson County Board of Education.” Jefferson County Public Schools. Retrieved January 27, 2026. <https://www.jefferson.kyschools.us/page/board-of-education>

meeting of the Board, the Vice Chair confirmed that multiple Board members have been assigned to lead or contribute to active committees: Vice Chair Craig with the Revenue Task Force, Board member Everett with the ARMAC, Board member Strange with the Local Planning Facilities Committee, and Board member Lister with the Board Policy Committee.⁷¹ These updated committee assignments have not been posted publicly as of January 2026.

The Board Policy Committee is the most active of the Board's committees, meeting eight or more times per year.⁷² This committee leads the process of reviewing, updating, and creating policies and receives support from the District's General Counsel's Office. Revised or new policies are reviewed multiple times before being submitted for Board approval. When developing policies, the committee uses sample language from KSSBA, ensures compliance with state and federal regulations, and incorporates advice from District leaders and subject matter experts.

Recommendations	
2.5.a	The District should update and actively maintain the Board of Education webpage to reflect all active committee titles, purpose, and membership.
2.6.a	The Board and JCPS committee chairs should standardize Board committee meeting minute formatting to ensure consistency and transparency with Board business and policy making.

Board Recruitment and Appointment of the Superintendent

One of the Board's primary responsibilities is to recruit, appoint, and establish the conditions of the contract for the District superintendent.⁷³ The superintendent reports directly to the Board and serves as the Chief Executive Officer of the District and the Chief Education Advisor to the Board. The superintendent's primary duties include ensuring all Board policies and procedures are implemented, administering the District's overall function and responsibilities in accordance with policies and state laws, and keeping the Board and public informed of the District's progress and activities.⁷⁴

In May 2025, the Board concluded the selection process for Dr. H. Brian Yearwood to serve as the 11th Superintendent of Jefferson County Public Schools. Dr. Yearwood officially started as Chief Executive Officer of JCPS on July 1, 2025, following the end of Dr. Martin Pollio's eight-year tenure (2017-2025). The exam team reviewed publicly available information between September 2024 and May 2025 regarding the Board's recruitment and appointment process for the District's superintendent. The timeline of actions taken by the Board in Figure 29 confirms adherence to Board Policy 02.1, which outlines the authority and responsibility of the Board and screening committee when filling a vacancy for the District's Superintendent.⁷⁵

⁷¹ "JCBE Meeting – November 18, 2025." Jefferson County Board of Education. Published November 18, 2025. Retrieved January 27, 2026. <https://www.youtube.com/watch?v=PX2cx1fB6fk>

⁷² "Jefferson County Committee Meetings." Kentucky School Boards Association. Retrieved January 23, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

⁷³ "Jefferson County Board of Education Policy 02.1 Recruitment and Appointment of Superintendent." Jefferson County Board of Education Policy Manual. Adopted/Amended August 26, 2013. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁷⁴ "Jefferson County Board of Education Policy 02.12 Duties of Superintendent." Jefferson County Board of Education Policy Manual. Adopted/Amended December 9, 2025. Retrieved January 23, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁷⁵ Ibid.

FIGURE 29: 2024-25 TIMELINE FOR THE JEFFERSON COUNTY BOARD OF EDUCATION'S SELECTION AND HIRING OF THE DISTRICT SUPERINTENDENT

DATE	Selection/Hiring Phase
September 27, 2024	Dr. Pollio officially announced his retirement as Superintendent of JCPS in a communication to the District.
October 15, 2024	JCBE officially accepted Dr. Pollio's retirement at the regular Board meeting and authorized the District to draft a Request for Proposals (RFP) for an Executive Search Firm to fill the role by July 1, 2025.
November 12, 2024	Board created the RFP Evaluation Committee comprised of members Craig (District 3), Duncan (District 5), and Strange (District 1) in addition to two community members. Board Member Strange was selected to Chair this committee.
December 13, 2024	RFP Evaluation Committee met for the first time to set scoring criteria and assignments for review of qualified proposals by January 9, 2025.
January 13, 2025	RFP Evaluation Committee met for the second and last time to review and recommend the selection of a qualified proposal response to JCBE.
January 14, 2025	JCPS Superintendent Search Advisory Committee met for the first time. Former JCBE Board Member Wesslund was announced as chairperson for this committee. Board Chair Schull introduced the timeline for searching, selecting, and appointing a new superintendent by July 1, 2025.
January 15, 2025	Special Meeting, the Board approved the RFP Evaluation Committee's recommendation to select the highest scoring RFP response from Hazard, Young, Attea, and Associates (HYA) to lead the search for superintendent candidates.
January 28, 2025	Board authorized HYA to post the superintendent position publicly and advertise it through EdWeek, The School Superintendents Association (AASA), Association of Latino Administrators and Superintendents (ALAS), and the National Alliance of Black School Educators. This meeting confirmed the Board would develop a leadership profile by February 1, 2025, and the community survey for the superintendent search would close on February 14, 2025.
February 13, 2025	JCPS Superintendent Search Advisory Committee met for the second time to review and discuss the leadership profile with members. Discussion was facilitated by a representative from HYA.
February 25, 2025	Work session meeting to present the outcomes of the community survey that included 4,568 responses received between January 24 and February 14, 2025.
March 11, 2025	Superintendent Screening Committee held its first meeting where the chairperson was nominated, process was reviewed with General Counsel, and scheduling of future meetings was discussed.
March 18, 2025	The Board approved the Leadership Profile for superintendent recruitment and selection at the regular scheduled meeting.
March 31, 2025	Superintendent Screening Committee met for the second time and received updates from HYA on the leadership profile, application screening process, applications received, and the timeline for reviewing qualified applicants.
April 7, 2025	Superintendent Search Advisory Committee met, reviewed the supplemental community survey analysis, and received a timeline update from the Board Chair on the hiring process.
April 14, 2025	Superintendent Screening Committee met for the third time and received updates from HYA on the recruitment statistics and hiring interview protocols in open session. The Committee entered executive session to formulate interview questions and discussion related to the hiring process.

April 24, 2025	Joint meeting between the Board and JCPS Superintendent Screening Committee in executive session. In open session, the Board authorized HYA to interview six candidates.
April 29, 2025	Board approved the creation of the Equity Screener Committee comprised of three Board members and three Screening Committee members appointed by each respective committee chair to score equity screener responses from finalists and answer candidates' questions.
May 5, 2025	Joint meeting between the Board and JCPS Superintendent Screening Committee in executive session to discuss finalists. No action was taken in closed session , and recess was approved to continue the discussion on May 6, 2025.
May 6, 2025	Joint meeting between the Board and JCPS Superintendent Screening Committee reconvened in executive session to discuss finalists. No action was taken in executive session. In open session, Committee voted to recommend two finalists determined in executive session: Benjamin Shuldiner and Dr. H. Brian Yearwood. Board accepted the recommendation unanimously.
May 8, 2025	Equity Screener Committee Special Meeting in executive session to discuss and evaluate two finalists. No meeting minutes were posted as of January 2026.
May 13, 2025	Board Chair announced the two superintendent finalists and invited the public to attend two public forums to ask questions of the candidates on May 20, 2025, and to provide feedback through a QR code and/or JCPS social media. The Board anticipated final deliberations to be scheduled at the May 22, 2025 meeting.
May 16, 2025	Equity Screener Committee Special Meeting in executive session to discuss and evaluate two finalists. No meeting minutes were posted as of January 2026.
May 19, 2025	Joint meeting between the Board and JCPS Superintendent Screening Committee in executive session to discuss finalists. No action was taken.
May 20, 2025	Superintendent Search Advisory Committee Special Meeting to meet, hear from, and answer questions from the two finalists selected from the search: Ben Shuldiner and Dr. H. Brian Yearwood. The Committee met with candidates at 1:00 PM for discussion. JCPS staff and the community were invited to ask questions between 4:00 and 6:00 PM and 7:00 and 9:00 PM at two locations in the district. No action was taken by the Board or Committee.
May 21, 2025	Superintendent Screening Committee met in executive session to have discussions that may have led to the appointment of the superintendent. No action was taken.
May 22, 2025	Board met in executive session to discuss and select a finalist. In open session, the Board moved to communicate an offer to the identified finalist and authorized counsel to begin contract negotiations. The motion was approved with a 5 – 2 vote in favor.
May 29, 2025	Special Meeting of the Board unanimously approved the contract for employment of Dr. Yearwood effective July 1, 2025.

Source: Kentucky School Boards Association website.

The Board's decision to select the final candidate in executive session on May 22, 2025, raised concerns with some stakeholders about the Board's transparency in decision-making, which were expressed publicly at the June 10, 2025 meeting during public comment.⁷⁶ Some stakeholders expressed during that meeting

⁷⁶ "JCBE Board Meeting – June 10, 2025." Jefferson County Board of Education. Published June 10, 2026. Retrieved January 23, 2026. <https://www.youtube.com/watch?v=VzGezX8qIYw>

that the public survey feedback did not reflect the Board's final choice, and some constituents expressed feeling dismissed or ignored by the Board members. During this same time, public reporting revealed certain data that suggested that an alternative superintendent candidate was the preferred choice among various stakeholder groups.⁷⁷ In the future, the Board should consider being far more transparent about the rationale supporting its pick for superintendent.

Board Evaluation of the Superintendent

Finding	
2.7	The rubric criteria and timeline for evaluating the new superintendent at the conclusion of the 2025-26 school year has not been communicated by the Board as of March 2026.

School boards in Kentucky are required by KRS 156.557 to complete and document a summative annual evaluation of the District's superintendent. The Board's evaluation model for the District superintendent, outlined in Board Procedure 02.14 AP.2, is a hybrid model that incorporates both the statutorily required evaluation criteria outlined by the Kentucky Department of Education (KDE) and the Instructional Leadership element of the Student Outcomes Focused Governance (SOFG) from the Council of the Great City Schools (CGCS).⁷⁸

The CGCS is an organization that aims to build capacity in 81 of the country's largest urban school districts to improve education for children in inner cities by boosting academic performance, narrowing achievement gaps, improving professional development, and strengthening leadership, governance, and management.⁷⁹ JCPS and Fayette County Public Schools are the two member districts participating in the Commonwealth of Kentucky.⁸⁰ Member districts can opt to access a variety of at-cost services that support the needs of urban districts, including strengthening leadership, governance, and management.

The CGCS coaching support services include options for training, facilitation, and use of the research-based SOFG continuous improvement framework.⁸¹ The SOFG framework is a tool comprised of multiple primary parts, including *Board Monthly Time Use Evaluation*, *Superintendent Annual Evaluation*, and a *Board Continuous Improvement Evaluation*.⁸² This tool was used to support JCPS and the Board during the development of the District's Goals and Guardrails, which were started in 2023 and are discussed later in this chapter.

The Board met to discuss Dr. Pollio's final summative evaluation for the 2024-25 school year on June 24, 2025, in a closed executive session:⁸³

⁷⁷ Johnson, K. "[Why JCPS Board Went Against Teacher, Principal Surveys in Hiring New Superintendent](https://www.courier-journal.com/story/news/education/2025/06/09/jcps-school-board-explains-reasons-hiring-brian-yearwood-superintendent/84028339007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=undefined&gca-ft=0&gca-ds=sophi)." Louisville Courier Journal. Published June 9, 2025. Retrieved April 13, 2026. <https://www.courier-journal.com/story/news/education/2025/06/09/jcps-school-board-explains-reasons-hiring-brian-yearwood-superintendent/84028339007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=undefined&gca-ft=0&gca-ds=sophi>

⁷⁸ "[Jefferson County Board of Education 02.14 Evaluation of the Superintendent](https://policy.ksba.org/Chapter.aspx?distid=56)." Jefferson County Board of Education Policy Manual. Adopted/Amended June 11, 2019. Retrieved January 27, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁷⁹ "[About CGCS](https://www.cgcs.org/about-cgcs)." Council of the Great City Schools. 2026. Retrieved January 27, 2026. <https://www.cgcs.org/about-cgcs>

⁸⁰ "[Member Districts](https://www.cgcs.org/about-cgcs/member-districts)." Council of the Great City Schools. Retrieved January 27, 2026. <https://www.cgcs.org/about-cgcs/member-districts>

⁸¹ "[Student Outcomes Focused Governance Manual](https://docs.google.com/document/d/1dxmymNgXi9nCG-f97E33Vgbv8b6W_RQmvGv4fFbYHFY/edit?tab=t.0)." Council of the Great City Schools. Retrieved January 27, 2026. https://docs.google.com/document/d/1dxmymNgXi9nCG-f97E33Vgbv8b6W_RQmvGv4fFbYHFY/edit?tab=t.0

⁸² Ibid.

⁸³ "[Jefferson County Special Meeting: Executive Session](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=49975&AgencyTypeID=)." Kentucky School Boards Association. Published June 24, 2025. Retrieved January 23, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=49975&AgencyTypeID=>

FIGURE 30: SUPERINTENDENT POLLIO'S SUMMATIVE EVALUATION SCORES, 2024-25 SCHOOL YEAR

EVALUATION STANDARD	Score (on a 1-4 scale)
Standard 1: Strategic Leadership	(3) Accomplished
Standard 2: Cultural Leadership	(4) Exemplary
Standard 3: Human Resource Leadership	(3) Accomplished
Standard 4: Managerial Leadership	(3) Accomplished
Standard 5: Collaborative Leadership	(4) Exemplary
Standard 6: Influential Leadership	(4) Exemplary
Standard 7a: Instructional Leadership	(3) Accomplished
Standard 7b: Instructional Leadership – Student Outcomes Focused Governance (SOFG) Goals and Annual Targets	(2) Developing

Source: Jefferson County Board of Education Special Meeting: Executive Session, June 24, 2025.

Superintendent Pollio's evaluation document is publicly available and includes Board member comments on each standard, offering insight into the rationale behind each summative rating. As the District began implementing Goals and Guardrails for the first time in 2024-25, Board members noted during their initial assessment of Standard 7b that additional time was necessary to determine how the new metrics would inform future evaluations of the superintendent's performance.

Interviews with Board members revealed that the superintendent's annual evaluation is a comprehensive and time-intensive process, requiring each Board member to prepare individual assessments that are subsequently compiled by Legal Counsel. The process continues to adapt based on feedback from training sessions with CGCS and the needs of the current Board members. Board members also indicated they have discussed strategies to enhance the efficiency of data collection, rating, and deliberation within the annual evaluation procedure.

Ultimately, the Board seeks to establish a rigorous and transparent evaluation system that supports ongoing District improvement and governance. However, further interviews with Superintendent Yearwood and the Board in Fall 2025 left unresolved whether Goals and Guardrails will be maintained, and what impact this may have on the evaluation criteria for Superintendent Yearwood's initial summative evaluation scheduled for Spring 2026.

Recommendation	
2.7.a	The Board should publicly confirm the annual evaluation criteria, process, and timeline for the District superintendent, and consult relevant stakeholders to inform the Board's annual evaluation of the superintendent.

BOARD GOALS AND PROGRESS MONITORING

Board Goals and Guardrails

Finding	
2.8	The Board does not have a governance framework that prioritizes student outcomes because there is no current District Strategic Plan and the Goals and Guardrails framework is stalled.

The Board is required to “establish long-range, Districtwide educational goals and objectives to guide the administration’s development of annual objectives and budget priorities” based on a three-to-five-year cycle

with an annual review and option for revision.⁸⁴ There are four goals (adopted in a 2013 Board policy) that guide the district's Educational Philosophy:⁸⁵

1. **Increased Learning:** Every Student progresses in his or her learning and meets or exceeds proficiency in all subjects.
2. **Graduation and Beyond:** Every student graduates prepared for his or her post-secondary choice – for college or career and life.
3. **Stakeholder Involvement/Engagement:** Parents, community, and partners enrich students' educational experiences and support their success.
4. **Safe, Resourced, Supported, and Equipped Schools:** All schools are staffed, resourced, and equipped to support student needs.

Additionally, the District was guided by the *District Strategic Plan: Vision 2020* as its primary set of focus areas and goals between 2015 and 2020.⁸⁶ Interviews with Board members and District staff noted this strategic plan largely concluded in 2020, requiring a new set of goals and strategies for the District.

In July and August of 2023, the Board engaged stakeholders through an assessment of the District's needs in a series of eight listening sessions and a survey.⁸⁷ The Board received support through contracted services from CGCS to engage the community and analyze results, leading to the creation of the Board's current Goals and Guardrails.

The Goals and Guardrails framework is supported by the implementation of the CGCS *Student Outcomes Focused Governance (SOFG) Manual*.⁸⁸ The Board has contracted with CGCS since February 28, 2023, to implement the SOFG through a range of virtual and on-site capacity building, professional development, advising, and coaching services. The current two-year contract, approved unanimously by the Board at the February 25, 2025 Work Session Meeting, began on February 28, 2025, and is effective through February 27, 2027, unless terminated early by either party with 30-day notice.⁸⁹

The Board approved five goals and five guardrails in 2023-24 to guide its work through 2030. School year 2024-25 was "Year 1" for the District to collect baseline data and set interim and annual targets in each area. The SOFG defines goals as:⁹⁰

Policy statements that are SMART, that are student outcomes focused, and that describe the Board's top priorities during the timeline for which they are adopted. The first priority for resource allocation in the school system should be toward achieving the Board's goals. Once those allocations are complete, remaining resources may be allocated in a manner that addresses the additional needs and obligations of the school system. Goals generally are set for a three-to-five-year period. Goals generally take the form of "student outcome will increase from X to Y by Z."

⁸⁴ "[Jefferson County Board of Education Policy 01.111 District Planning](#)." Jefferson County Board of Education Policy Manual. Adopted/Amended July 8, 2025. Retrieved January 27, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁸⁵ "[Jefferson County Board of Education Policy 01.54 Educational Philosophy](#)." Jefferson County Board of Education Policy Manual. Adopted/Amended May 28, 2013. Retrieved January 27, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁸⁶ "[Vision 2020: Excellence with Equity](#)." Jefferson County Public Schools. Retrieved January 27, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/1c12ba6c-37a5-4ce9-b6c2-e82bb3f73bce/Vision_2020.pdf?disposition=inline

⁸⁷ "[2023 Community Listening Analysis](#)." Jefferson County School Board. Retrieved January 27, 2026. https://docs.google.com/document/d/11yR_QHQcRgq4RSSOzeV8eN33vjstFsQw1LRk3ZWkqnc/edit?tab=t.0

⁸⁸ "[Student Outcomes Focused Governance Manual](#)." Council of the Great City Schools. Retrieved January 27, 2026. https://docs.google.com/document/d/1dxmymNgXi9nCG-f97E33Vgbv8b6W_RQmvGv4fFbyHFY/edit?tab=t.0

⁸⁹ "[Jefferson County Work Session February 25, 2025](#)." Kentucky School Boards Association. Published February 25, 2025. Retrieved January 27, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=48329&AgencyTypeID=>

⁹⁰ "[Student Outcomes Focused Governance Manual](#)." Council of the Great City Schools. Retrieved January 27, 2026. https://docs.google.com/document/d/1dxmymNgXi9nCG-f97E33Vgbv8b6W_RQmvGv4fFbyHFY/edit?tab=t.0

Following this structure and the 2024-25 baseline data presented by the District on August 19, 2025, the Board adopted the following goals. The targets for June 2030 for Goals 1, 2, and 3 were not identified at the time, but these goals were established to guide the District's work.⁹¹

FIGURE 31: GOALS ADOPTED BY THE JEFFERSON COUNTY BOARD OF EDUCATION IN 2025

GOAL	Topic	Goal Metric
1	Elementary School Academic Readiness	The percentage of 5 th -grade students who score “ready” on the JCPS Academic Readiness measures will increase from 39% in June 2025 to X% by June 2030.
2	Middle School Academic Readiness	The percentage of 8 th -grade students who score “ready” on the JCPS Academic Readiness measures will increase from 37.6% in June 2025 to X% by June 2030.
3	High School Academic Readiness	The percentage of 12 th -grade students who score “ready” on the JCPS Academic Readiness measures will increase from 36.7% in June 2025 to X% by June 2030.
4	3 rd Grade Literacy	The percentage of 3 rd -grade students who met or exceeded their expected growth and/or achievement benchmarks (50 th percentile) in Reading according to the Spring Measures of Academic Progress (MAP) assessment will increase from 66% in June 2024 to 81% by June 2030.
5	8 th Grade Numeracy	The percentage of 8 th -grade students who met or exceeded their expected growth and/or achievement benchmarks (50 th percentile) in Math according to the Spring MAP assessment will increase from 61% in June 2024 to 76% by June 2030.

Source: Jefferson County Board of Education Meeting, August 19, 2025.

The SOFG defines guardrail as “[a]n operational action or class of actions, usually strategic not tactical, the Superintendent may not use or allow in pursuit of the school system’s student outcome goals. Guardrails are based on the community’s values and should not undermine the school system’s ability to meet the goals — though guardrails will often require the Superintendent to accomplish the goals in a different way.”⁹² The Board adopted the following guardrails to guide the district in meeting its goals:

FIGURE 32: GUARDRAILS ADOPTED BY THE JEFFERSON COUNTY BOARD OF EDUCATION IN 2025

GUARDRAIL	Topic	Description
1	Protect Safety	JCPS shall not allow unsafe conditions (either socially, emotionally, or physically).
2	Protect Racial Equity	JCPS shall not make significant decisions without first ensuring alignment with the Racial Equity Plan.
3	Protect Inclusive Decision Making	JCPS shall not make significant decisions without collaborating with impacted stakeholders.
4	Protect Equitable Resourcing	JCPS shall not allow inequitable resource allocation for ECE students and/or ML students.
5	Protect Appropriate Testing	JCPS shall not utilize more than the minimum number of district-mandated assessments to monitor student outcomes.

Source: Jefferson County Board of Education Goals & Guardrails.

⁹¹ “[Jefferson County Regular Business Meeting August 19, 2025](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=51432&AgencyTypeID=).” Jefferson County Board Meeting. Published August 19, 2025. Retrieved January 27, 2026.

⁹² <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=51432&AgencyTypeID=>

“[Student Outcomes Focused Governance Manual](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=51432&AgencyTypeID=).” Council of the Great City Schools. Retrieved January 27, 2026. https://docs.google.com/document/d/1dxmymNgXi9nCG-f97E33Vgbv8b6W_RQmvGv4fFbYHFY/edit?tab=t.0

Noted in Figure 27, the Board spent 24% of the overall minutes at public Board meetings in 2025 discussing content related to Goals and Guardrails presentations. As of November 18, 2025, the District had presented an update to the Board for all interim Goals and Guardrails based on data from the 2024-25 school year.⁹³ However, as of January 2026, neither the District nor the Board has published or confirmed all targets related to the Goals and Guardrails through the year 2030.⁹⁴ During interviews with the exam team in Fall 2025, the Board and JCPS Cabinet members noted they had paused any further updates to the Goals & Guardrails at scheduled Board meetings until they have addressed the budget deficit for FY2026-2027.

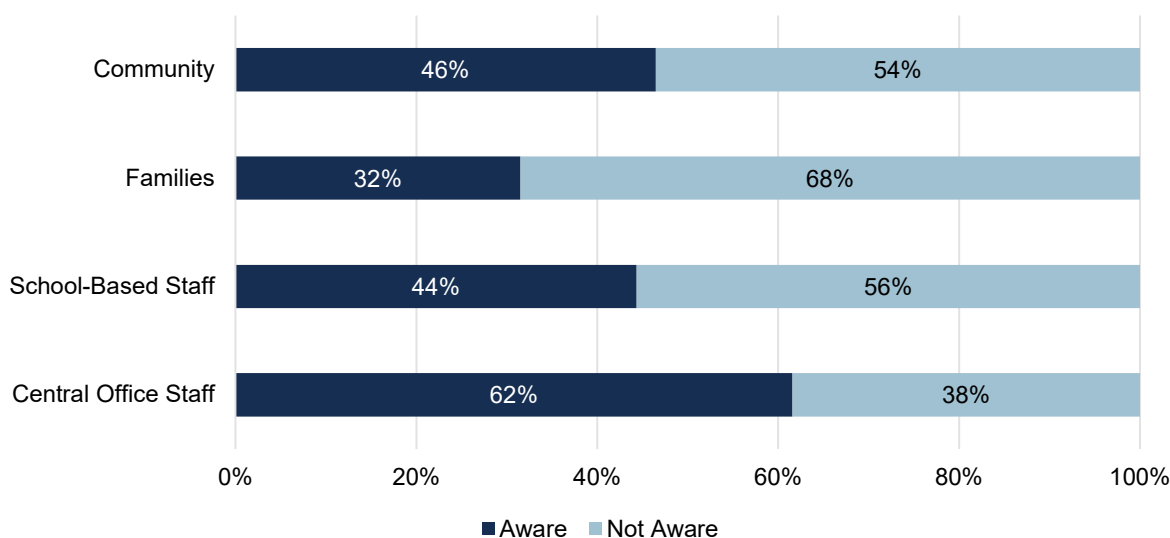
During interviews with the exam team, current Board and District Cabinet members, some of whom were not part of the initial process to develop these Goals and Guardrails, questioned whether the scope is too narrow to effectively measure the District's overall progress. Board members noted additional priorities exist beyond the five identified goals related to student discipline policies, procedures, and college and career readiness, which are not explicitly included in the Goals. Superintendent Yearwood expressed during interviews his intent to work with the community to create a new strategic plan for JCPS and has not confirmed the extent to which it will align with the Board's current Goals and Guardrails.

Recommendation	
2.8.a	The Board and superintendent should determine unified District goals to measure student outcomes and the District's overall success.

Stakeholder Awareness and Perception of Goals and Guardrails

In the exam surveys to stakeholder groups in Fall 2025, awareness of the details of the Board's Goals and Guardrails varied by stakeholder group, as seen in Figure 33.

FIGURE 33: COMMUNITY, FAMILY, AND STAFF AWARENESS OF JEFFERSON COUNTY BOARD OF EDUCATION'S GOALS AND GUARDRAILS



Source: Special Examination Survey.

Central Office staff respondents had the highest awareness of the goals at 62%. During interviews with the exam team, Cabinet members and their direct reports noted they were heavily involved in supporting the

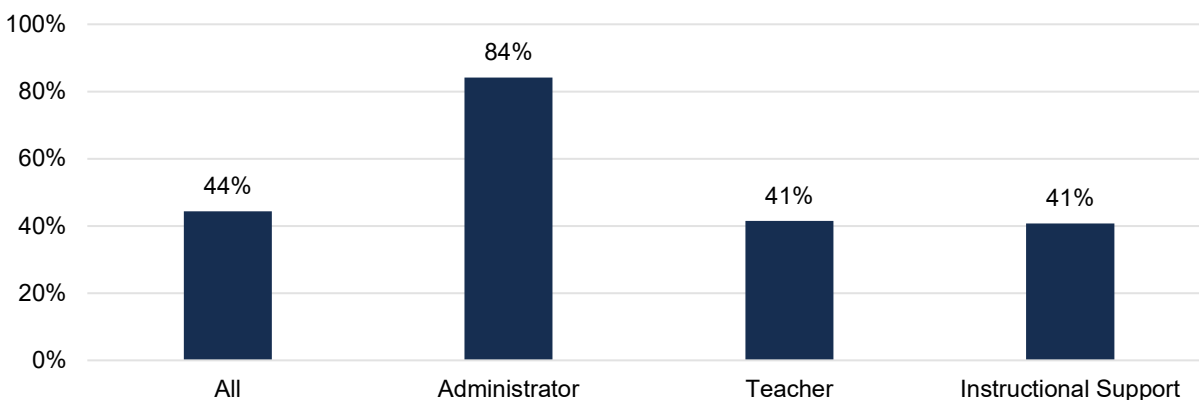
⁹³ "JCBE Meeting – November 18, 2025." Jefferson County Board of Education. Published November 18, 2025. Retrieved January 27, 2026. <https://www.youtube.com/watch?v=PX2cx1fB6fk>

⁹⁴ "Goals & Guardrails." Jefferson County Board of Education. Published November 12, 2024. Retrieved January 27, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d961aa6c-6589-4634-8ac8-78e1e5fd45b8/JCBOE_Goals___Guardrails_-_Annual_Targets___Int.pdf?disposition=inline

data collection and reporting to the Board for their respective departments throughout the 2024-25 school year. This may have contributed to a higher level of awareness among this group. However, less than half of respondents for community members, families, and school-based staff said they were aware of the Board's Goals and Guardrails.

School-based administrators who responded to the JCPS Exam Survey were more aware (84%) of the Board's Goals and Guardrails compared to teachers and instructional support staff, as seen in Figure 34:

FIGURE 34: SCHOOL-BASED STAFF AWARENESS OF JEFFERSON COUNTY BOARD OF EDUCATION'S GOALS AND GUARDRAILS, BY ROLE

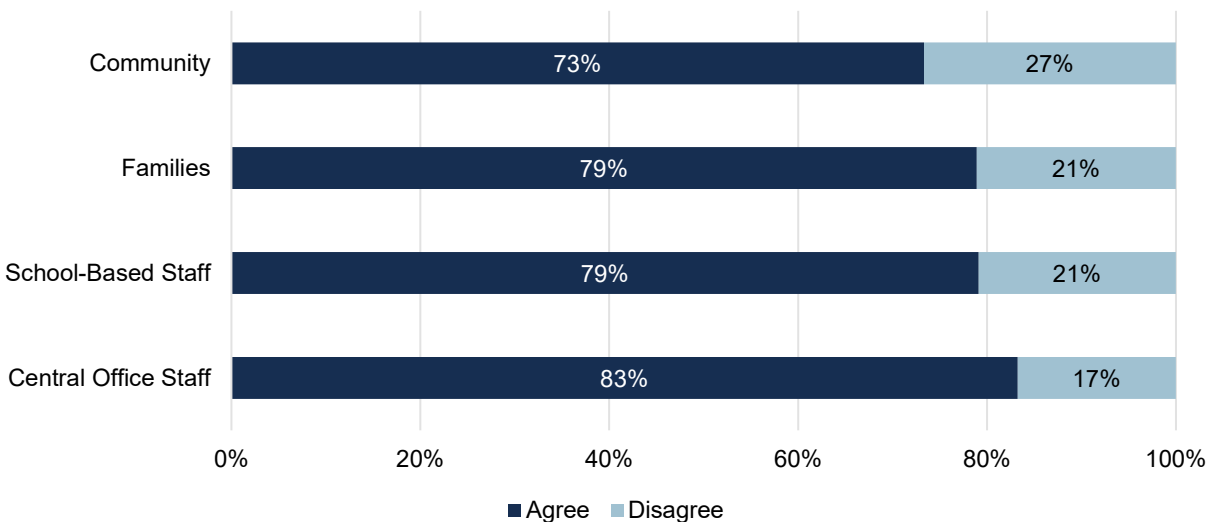


Source: Special Examination Survey.

Focus groups with JCPS school principals confirmed that administrators are mostly aware of the Board's Goals and Guardrails, and how professional and school-based goals are connected to the work in their schools. However, the survey showed that non-administrator staff were less aware overall.

Though awareness of the details of the Board's Goals and Guardrails varied by stakeholder group, most stakeholders agreed that the Goals and Guardrails guide the work of the District, as seen in Figure 35:

FIGURE 35: COMMUNITY, FAMILY, AND STAFF AGREEMENT WITH "THE BOARD'S GOALS AND GUARDRAILS GUIDE THE WORK OF JCPS"



Source: Special Examination Survey.

Board Self-Evaluation and Progress Monitoring

Finding	
2.9	The Board has not completed a quarterly self-assessment in a scheduled public meeting since April 8, 2025.

The Board established a six-year Goal Monitoring Calendar for 2025 through 2030, which publicly identifies when responsible parties will present progress toward meeting and completing goals, guardrails, self-evaluations, and other required actions.⁹⁵ The Board conducted its first scheduled self-evaluation of ‘Year 1’ using the CGCS SOFG framework publicly at the Regular Work Session Meeting held on April 8, 2025.⁹⁶ The SOFG framework is designed to guide the Board’s quarterly self-evaluation of its progress toward being more student-outcomes focused across six competency rubrics with support from a CGCS facilitator.

The self-evaluation process was facilitated by a CGCS coach during a 38-minute session in the approved agenda. The coach led the Board’s collective reflection process through conversational prompting and identified next steps aligned to the self-evaluation ratings in each of the six competency rubrics within the SOFG framework. The Board collectively approved a self-evaluation score of 70 of 100 total points according to the criteria met in each of the rubrics as follows:⁹⁷

FIGURE 36: JEFFERSON COUNTY BOARD OF EDUCATION SELF-EVALUATION OF STUDENT OUTCOMES FOCUSED GOVERNANCE, APRIL 18, 2025

CRITERION	Rating	Points
Vision & Goals	Mastering Student Outcomes Focus	35
Values & Guardrails	Approaching Student Outcomes Focus	5
Monitoring & Accountability	Mastering Student Outcomes Focus	30
Communication & Collaboration	Not Student Outcomes Focused	0
Unity & Trust	Not Student Outcomes Focused	0
Continuous Improvement	Not Student Outcomes Focused	0
Total Points		70

Source: Jefferson County Board of Education Meeting, April 8, 2025.

The Board also confirmed during this discussion that they were not using the Board Monthly Time Use Evaluation tool in the SOFG framework, nor tracking the use of minutes for each agenda item in public meetings as of April 8, 2025.⁹⁸ The coach affirmed that this is a strategy that can be easily implemented at future meetings by someone on the Board should they choose to do so. It is not clear whether this strategy has been implemented since the April 18, 2025 meeting.

During the discussion, Board members cited questions regarding the amount of time they were given to prepare for this self-evaluation discussion, whether this was the appropriate forum to conduct the self-evaluation, and whether this activity aligned with the shared goal of finishing meetings in under two hours. The Board’s subsequent quarterly self-evaluations were scheduled for June 24, 2025, and October 14,

⁹⁵ “Jefferson County Public Schools Board Goal Monitoring Calendar.” Jefferson County Public Schools. Published September 8, 2025. Retrieved January 27, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/edd638fa-e764-4fa1-bbd4-bf02de21ea8c/Board-Monitoring-Calendar-Revised-9.8.25---Board_Monitoring_Calendar.pdf?disposition=inline

⁹⁶ “JCBE Board Meeting – April 8, 2025.” Jefferson County Board of Education. Published April 8, 2025. Retrieved January 27, 2026.

<https://www.youtube.com/watch?v=AAUjwRqvt8&list=PLInXjzUvYjOPfWnyRjp4s6H0DpgFo5ONA&index=13>

⁹⁷ Ibid.

⁹⁸ Ibid.

2025.⁹⁹ No evidence was found in public meetings that the Board had completed a subsequent self-assessment using the SOFG framework.¹⁰⁰

Recommendation	
2.9.a	The Board should adhere to a regularly scheduled self-evaluation and share the schedule and evaluation results publicly.

⁹⁹ “[Jefferson County Public Schools Board Goal Monitoring Calendar](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/edd638fa-e764-4fa1-bbd4-bf02de21ea8c/Board-Monitoring-Calendar-Revised-9.8.25---Board_Monitoring_Calendar.pdf?disposition=inline).” Jefferson County Public Schools. Published September 8, 2025. Retrieved January 27, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/edd638fa-e764-4fa1-bbd4-bf02de21ea8c/Board-Monitoring-Calendar-Revised-9.8.25---Board_Monitoring_Calendar.pdf?disposition=inline

¹⁰⁰ “[Jefferson County Board Meetings](https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89).” Kentucky School Boards Association. Retrieved January 23, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

CHAPTER 3: INTERNAL AUDIT

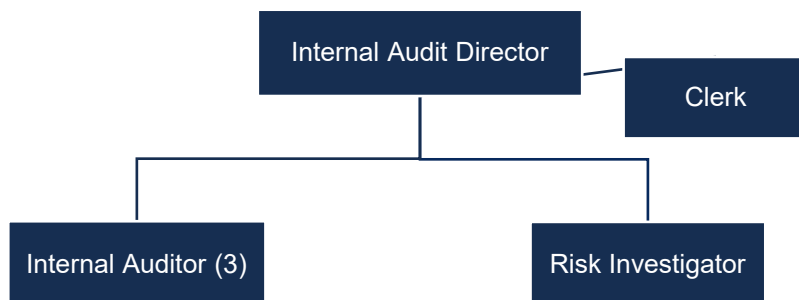
The Internal Audit Department at JCPS is responsible for providing reasonable assurance that processes within the District operate efficiently and effectively in order to meet the requirements and expectations of stakeholders. In doing so, Internal Audit provides a wide range of audit service options, with the recommended type of service to be provided based on the overall objective and expectations.¹⁰¹ ¹⁰² In addition to performing various audit and engagement projects, Internal Audit also investigates allegations and concerns, as well as monitors for compliance at the school level.¹⁰³

OVERVIEW OF THE INTERNAL AUDIT

Personnel

Because the Internal Audit Department operates under The Institute of Internal Auditors' International Professional Practices Framework, the Board and the Superintendent must ensure that the internal audit function is performed by qualified individuals, led by an Internal Audit Division Leader.¹⁰⁴ As of June 30, 2025, the Internal Audit Department was comprised of six members, including the Director, a Risk Investigator, three Internal Auditors, and a Clerk.¹⁰⁵ As shown in Figure 37 all Internal Audit Department personnel report directly to the Director.

FIGURE 37: JEFFERSON COUNTY PUBLIC SCHOOLS INTERNAL AUDIT ORGANIZATIONAL CHART



Source: APA, based on data and information provided by JCPS.

The audit/investigation experience of the five audit employees who conduct audits ranges from eight to 18 years, and three of the five have one or more certifications, as shown in Figure 38.¹⁰⁶

¹⁰¹ "Jefferson County Public Schools Internal Audit Department Audit Plan 2022-23." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁰² "Jefferson County Public Schools Internal Audit Department Audit Plan 2023-24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁰³ "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 12.31.24." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].

¹⁰⁴ "Jefferson County Board of Education Policy 04.9 Fiscal Management: Audits." Kentucky School Boards Association. Published September 2, 2025. Retrieved May 2, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

¹⁰⁵ "04 16 2025 Internal Audit Presentation to ARMAC." Jefferson County Board of Education. Published April 16, 2025. Retrieved June 2, 2026.

<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=49299&AgencyTypeID=>

¹⁰⁶ "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report, Period Ending June 30, 2025." [PDF].

FIGURE 38: INTERNAL AUDIT DEPARTMENT PERSONNEL OVERVIEW AS OF JUNE 30, 2025

POSITION	Certification(s)	Internal Audit Department Tenure	Audit/Investigation Experience
Director	Certified Internal Auditor, Certified Fraud Examiner	1 Year	18 Years
Risk Investigator	Certified Fraud Examiner	5 Years	9 Years
Internal Auditor	Certified Public Accountant	4 Years	10 Years
Internal Auditor	N/A	8 Years	8 Years
Internal Auditor	N/A	0 Years	15 Years

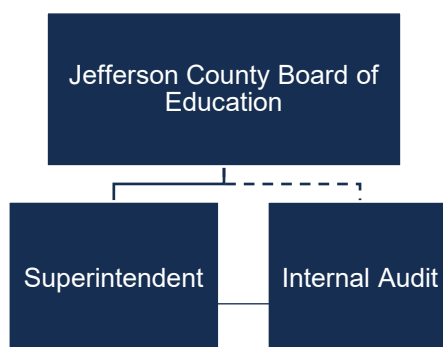
Source: APA, based on data and information provided by JCPS.

Reporting Structure

Finding	
3.1	The Internal Audit Director reports to three different individuals or groups: the Superintendent, the Board, and ARMAC. However, the Superintendent performs the performance evaluation for this position with limited input from the Board or ARMAC. Because the Superintendent is also the individual to whom the Internal Audit Director reports administratively and whose own performance evaluation may be adversely impacted by the work of the Internal Audit Department, the independence of the internal audit function could be compromised or appear to be compromised.

The Internal Audit Director functionally reports to the Board and, administratively, to the Superintendent to ensure independence and objectivity. This means that while the Internal Audit Director reports to Central Office for day-to-day operations, the oversight and technical direction given to the position comes from the Board. However, the Board and the Audit and Risk Management Advisory Committee (ARMAC) provide only informal feedback on the performance of the Internal Audit Director, while the Superintendent, in consultation with the Chief of Staff, actually prepares the Internal Audit Director's performance evaluation. Figure 39 shows the Internal Audit Function Organization.¹⁰⁷

FIGURE 39: INTERNAL AUDIT FUNCTION ORGANIZATIONAL CHART



Source: APA, based on data and information provided by JCPS.

¹⁰⁷ "Jefferson County Public Schools Internal Audit Charter." Jefferson County Public Schools. Published September 13, 2022. Retrieved June 1, 2026. <https://www.jefferson.kyschools.us/page/internal-audit>; "Internal Audit Policies and Procedures." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].

Recommendation	
3.1.a	District leadership, the Board, ARMAC, and the Internal Audit Director should work together to clearly define the roles and responsibilities of each as they relate to the evaluation process for the Internal Audit Director position. In addition, the Board, or a designated Board committee such as ARMAC, should perform the annual evaluation of the Internal Audit Director, with input from the Superintendent.

Board Communication

Finding	
3.2	The process for the Internal Audit Department to communicate responses to Board members' questions lacked transparency due to the filtering of information through one or more Chiefs prior to Board members receiving responses.

As of the 2025-26 school year, the Chief of Staff received bi-weekly reports from the Director of Internal Audit and managed the flow of communication between Internal Audit and the Board, according to staff. Internal requests for projects coming from the Superintendent's office typically came from the Chief of Staff and more recently are coming through the new Special Assistant to the Superintendent.

According to staff, JCPS follows a process for documenting questions that the JCPS administration receives from Board members. Following a process typical in school districts, JCBE member questions are documented and answered in writing and made transparent to all Board members and senior-level administrators who work closely with the Board. This documentation is often referred to as the Board Question and Answer (Q&A) document. This practice allows for transparency so that all Board members can benefit from seeing exactly what questions have been asked, by whom, and what the response is.

Board members are free to email and call the Internal Audit Department directly with any questions or concerns they would like to discuss. The Internal Audit team will then document the question and response for the Q&A document. Staff reported an issue with this process, stating the Internal Audit Department formal written responses are typically filtered through the Chief of Staff and General Counsel prior to being made available on the Q&A document. According to staff, this filtering may have resulted in nonresponsive, delayed, or incomplete information, hindering Board members' ability to make informed decisions and diminishing the Board's trust in the information provided.

Recently, the Director of Internal Audit was given access to view the Q&A document, allowing more transparency as to how Internal Audit response information was published. Prior to having access to the Q&A document, it was not possible for the Internal Audit Department to see how or when their responses to Board members were communicated, which was a limitation of the process. As a role that indirectly reports to the Board and has frequent communication with the Board, the exam team believes the Director of Internal Audit should have access to the Board's Q&A document and should be able to provide unfiltered, independent responses to Board member questions. The Director of Internal Audit's access to the Q&A document supports transparent communication between the Internal Audit Department and the Board.

According to staff, there is no documented policy regarding communication flow between the Board and Internal Audit. Board members should consider a policy that reflects a direct line of communication between Board and Internal Audit.

Recommendation	
3.2.a	Internal Audit Department communications to the Board should not be filtered or edited by any individual. All Board questions and Internal Audit responses should be published verbatim in the Board Q&A for transparency. The Board should develop a policy to reflect this direct line of communication.

JCPS Audit and Risk Management Advisory Committee (ARMAC)

Findings	
3.3	A review of ARMAC minutes during the examination period (FY23-25) found that no JCBE members attended any ARMAC meetings. While it is not required that a Board member serve as either a voting or non-voting member of ARMAC under the ARMAC charter or by written Board policy, having a Board member present for ARMAC meetings would keep the Board better informed. In the fall of 2025, a Board member was assigned to attend ARMAC meetings. The Board member's role is to attend ARMAC meetings and provide informal communication to the Board regarding ARMAC discussions and recommendations. However, the ARMAC Charter has not been updated to reflect this change.
3.4	Despite the ARMAC Charter requiring ARMAC to provide updates to the Board at least twice a year, there is no standardized or formalized process for ARMAC members to present updates during Board meetings, and ARMAC does not routinely report directly to the Board.
3.5	Two members of ARMAC have served beyond the period recommended in the ARMAC Charter.

While not depicted on the previous figure, the Internal Audit Director also has a reporting relationship with ARMAC, also known as the Audit Committee.¹⁰⁸ The Board established ARMAC in June 2018 by adopting a Committee Charter. Under the Charter, ARMAC assists the Board in overseeing the risks that impact JCPS's financial and strategic objectives. ARMAC's role is advisory, and any recommendations provided to the Board are subject to Board review and approval. The Charter states that ARMAC will advise the Board on the following:

- The integrity and presentation of financial statements and operational reporting;
- The qualifications, independence, and performance of the independent external auditors and the JCPS internal audit function;
- The system of internal controls including procedures for detecting fraud, waste, and abuse;
- Adequacy of the JCPS strategic and operational risk management processes;
- JCPS compliance with laws and regulations;
- Adequacy of JCPS investigations processes;
- JCPS ethics, values and culture; and
- Other matters as directed by the Board.¹⁰⁹

ARMAC is to be comprised of five to seven members appointed by the Board, each serving recommended terms not to exceed three years. Terms among members should be staggered, with service beyond two consecutive terms not being recommended. Members of ARMAC are volunteers and cannot be Board members or JCPS staff. ARMAC members must collectively possess knowledge in accounting, external auditing, internal auditing, governmental fund accounting, financial reporting, operational risk management, and strategic risk management. The specific requirements are as follows:

- Half of the members must be residents of the JCPS district.
- One member must be considered a financial expert by ARMAC.
- Membership must be as balanced as practicable in gender, diversity, and public/private sector experience.
- Each member must have or acquire an understanding of JCPS's strategy, mission, and governance.

¹⁰⁸ "Jefferson County Public Schools Internal Audit Charter." Jefferson County Public Schools. Published September 13, 2022. Retrieved June 1, 2026. <https://www.jefferson.kyschools.us/page/internal-audit>

¹⁰⁹ Ibid.

- Independent from JCPS and the Board for three years prior to appointment and during their time on ARMAC.
- Not seek or accept instructions from any outside organization or interest group.
- Not hold positions with companies that have a significant business relationship with JCPS or engage in activities that may impair independence or the appearance thereof.¹¹⁰

During the examination period, it was noted that five individuals served on ARMAC. Two of the five members served longer than the recommended maximum of two consecutive terms (six years), as noted in the Charter. Both committee members have served since June 2018 and were authorized in 2024 by the JCPS General Counsel to continue serving in a holdover capacity while the committee identifies replacements.

ARMAC is required to meet at least quarterly and to update the Board at least twice a year about its activities and any recommendations. In addition, the Charter requires ARMAC to provide an annual written report to the Board that includes the following:

- How ARMAC fulfilled its obligations under the Charter.
- Any significant recommendations made to the Board or management, and the degree to which recommendations have or have not been resolved.
- A review of the annual independent audit report and any communication from the external auditor, such as a management letter or significant findings.
- Any significant internal control deficiencies, deficiencies in the enterprise risk management program, or concerns of fraud, waste, or abuse.
- Any indications of material or significant non-compliance with laws, policies, procedures, or regulations.
- Any recommendations for the Board to amend the Audit Committee Charter.
- Any other matters ARMAC believes should be disclosed to the Board.¹¹¹

ARMAC held four meetings in FY23, eight in FY24, and four in FY25, with no JCBE members attending any of the meetings. Additionally, there were no updates on ARMAC in the committee reports section of the JCBE meeting minutes during the examination period.¹¹²

Recommendations	
3.3.a	Both the Board policy and the ARMAC Charter should be updated to require either that a designated Board member be present at all ARMAC meetings or that a member be formally assigned to ARMAC as either voting or non-voting.
3.4.a	The Board, ARMAC members, District Leadership, and the Internal Audit Director should work together to formalize the process for ARMAC to report out to the full Board. This may include both the creation of standard documents or reports to be presented to the Board, as well as verbal reports from the Board member designated or assigned to ARMAC at the next Board meeting that follows an ARMAC meeting.
3.5.a	The Board, ARMAC members, and District Leadership should consider whether the recommended length of time for consecutive membership on ARMAC should be extended or if the recommended length should be made a requirement.

¹¹⁰ “[Jefferson County Public Schools Internal Audit Charter](https://www.jefferson.kyschools.us/page/internal-audit).” Jefferson County Public Schools. Published September 13, 2022. Retrieved June 1, 2026. <https://www.jefferson.kyschools.us/page/internal-audit>

¹¹¹ Ibid.

¹¹² “[Jefferson County Board and Committee Meetings](https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89).” Kentucky School Boards Association. Retrieved June 1, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

Budget

Internal Audit's budget is integrated into the District's overall budgeting process. Budgetary requests from Internal Audit are combined into the overall budget request presented to the Board every spring. The Internal Audit Director provides the Chief of Staff with a copy of the budget. If items the Internal Audit Director believes are critical to the department's effectiveness are cut from the budget, the Internal Audit Director will forward the concerns to the Superintendent and/or the Board for further consideration.¹¹³ Figure 40 shows the Internal Audit Department's Budget between FY23 and FY26 increased from \$980,988 to \$1,000,291, respectively.

FIGURE 40: INTERNAL AUDIT DEPARTMENT BUDGET FOR FY23, FY24, FY25, AND FY26

CATEGORIES	FY23	FY24	FY25	FY26
Salaries and Benefits	\$443,988	\$466,187	\$476,752	\$573,641
Audit Services	\$127,000	\$86,400	\$127,400	\$126,400
Registration Fees (Professional Development)	\$2,155	\$3,000	\$2,500	\$3,500
Supplies – Technology Related	\$3,980	\$2,450	\$3,255	\$2,155
Department Supplies	\$200	\$545	\$200	\$200
Subscription	\$995	\$1,005	\$995	\$1,095
In/Out of District Travel	\$1,670	\$2,000	\$2,000	\$2,000
Total Internal Audit Activities Budget	\$579,988	\$561,587	\$613,102	\$708,991
	FY23	FY24	FY25	FY26
Actuarial Fees	\$4,000	\$4,000	\$5,000	\$5,000
External Audit	\$235,000	\$235,000	\$264,000	\$265,000
Governance Risk Compliance Platform	\$162,000	\$66,000	\$66,150	\$0
Hotline Vendor	\$0	\$33,900	\$21,300	\$21,300
Total External Services	\$401,000	\$338,900	\$356,450	\$291,300
Total Internal Audit Budget	\$980,988	\$900,487	\$969,552	\$1,000,291

Source: APA, based on data and information provided by JCPS.

Note: FY23 Audit Services includes an outsourced Internal Audit, which includes \$47,000 for a non-recurring project in FY23.

Note: FY24 Audit Services includes a co-Sourced Internal Audit.

Note: The FY24 Hotline Vendor includes \$10,000 for language translation of site (one-time) in FY24.

Note: The FY25 and FY26 Audit Services includes an outsourced Internal Audit Department.

Available Services

The five types of services offered by Internal Audit in FY23 and FY24 are shown in Figure 41.

¹¹³ "Internal Audit Policies and Procedures." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].

FIGURE 41: AVAILABLE INTERNAL AUDIT SERVICES IN FY23 AND FY24

SERVICES	Description
Assurance	Objective examinations of evidence for the purpose of providing independent assessments of governance, risk management, and control processes for the organization. Examples include financial, compliance, operational, and information technology audits.
Consulting	Advisory and related client-service activities, the nature and scope of which are agreed to with the client, are intended to add value and improve the District's governance, risk management, and control processes without the internal auditor assuming management responsibility. Examples include counsel, advice, and process improvement.
Compliance/Monitoring	A continuous process (typically monthly) to ensure that specific regulatory activities are occurring as required. Its purpose is to identify compliance risk issues in a process in a timely manner.
Investigations	Potentially fraudulent activities or special assignments that originate from reports through the anonymous hotline, Superintendent, Cabinet members, and/or JCBE members.
Follow-Up	Also referred to as corrective action plans, follow-up reviews are conducted to determine the adequacy and timeliness of actions taken by management on reported engagement findings and recommendations. This work determines if management has acted or accepted the risk of not acting on reported findings.

Source: APA, based on data and information provided by JCPS.

In FY25, Internal Audit continued to offer services related to assurance, consulting, and compliance/monitoring; however, as shown in Figure 42, the description of investigations was changed, and follow-up was replaced with information technology audits.¹¹⁴

FIGURE 42: NEW AND REVISED AVAILABLE INTERNAL AUDIT SERVICES IN FY25

SERVICES	Description
Information Technology Audit Services	Objective examinations and evaluations of the District's information technology infrastructure, applications, data use and management, policies, procedures, and operational processes against recognized standards or established policies. Audits evaluate if the controls to protect information technology assets ensure integrity and are aligned with organizational goals and objectives.
Integrity/ Investigation Services	Potentially fraudulent activities or special assignments that originate from reports through the anonymous hotline, Superintendent, Cabinet members and/or JCBE members. The length of each investigation is based on the facts and circumstances of each case.

Source: APA, based on data and information provided by JCPS.

¹¹⁴ "Jefferson County Public Schools Internal Audit Department Audit Plan 2022-23." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2023-24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2024-25." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2025-26." Jefferson County Public Schools. Retrieved December 3, 2025. [PDF].

INTERNAL AUDIT WORK CONDUCTED DURING EXAMINATION PERIOD

The Internal Audit Department completed numerous projects, including audits and engagements, consulting projects, reviews, monthly monitoring tasks, and investigations during the examination period.¹¹⁵

Audits and Engagements

Between FY23 and FY25, Internal Audit completed 14 projects, as outlined in Figure 43. All projects were distributed to JCPS leadership, the Board, and the relevant division director for each project. Additionally, in the last half of FY24, ARMAC began receiving projects to reflect the formalization of report distribution practices.¹¹⁶

FIGURE 43: COMPLETED PROJECTS DURING FY23, FY24, AND FY25

ISSUE DATE	Project Title	Engagement Type	Number of Findings	Number of Recommendations	Division/Area
08/31/2022	Inventory Process Review	Operational Audit	2	2	Operation
08/31/2022	Employee Separation Process Review	Operational Audit	2	2	Human Resources
11/30/2022	Building Modification Process Review	Operational Audit	3	3	Operation
02/01/2023	Internal Penetration Test	IT Audit	3	3	Information Technology
03/24/2023	External Penetration Test	IT Audit	2	2	Information Technology
06/21/2023	Ransomware Assessment	IT Audit	12	12	Information Technology
09/28/2023	Grants Management Review	Operational Audit	4	9	Financial Services
11/03/2023	Travel & Expense Reimbursement Review	Operational Audit	3	3	Financial Services
02/05/2024	Microsoft Cloud Review	IT Audit	9	9	Information Technology

¹¹⁵ "Internal Audit Summary Annual Engagement Follow-Up Report." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 09.30.24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 12.31.24." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 03.31.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 06.30.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹¹⁶ "Internal Audit Summary Annual Engagement Follow-Up Report." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 09.30.24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 12.31.24." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 03.31.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 06.30.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

ISSUE DATE	Project Title	Engagement Type	Number of Findings	Number of Recommendations	Division/Area
04/22/2024	Substitute Usage Process Review	Operational Audit	3	5	Human Resources
06/20/2024	Internal and External Penetration Test	IT Audit	21	21	Information Technology
11/15/2024	Internal Penetration Remediation Testing	IT Audit	19	43	Information Technology
11/25/2024	Contractor Background Check Process Review	Operational Audit	6	10	Human Resources/ Operations Services
12/20/2024	Electric License Usage Audit	Operational Audit	6	6	Operations Services

Source: APA, based on data and information provided by JCPS.

Note: Ransomware Assessment and Grants Management Review are co-sourced engagements.

Compliance/Monitoring

Each month during the exam period, the Internal Audit Department staff conducted monthly monitoring activities for Student Activity Funds at the school level by reviewing transactions and verification forms at numerous schools across JCPS.¹¹⁷

Investigations

In addition to performing various audit and engagement projects and monitoring compliance, the Internal Audit Department also investigates allegations and concerns related to ethics, fraud, conflicts of interest, waste, and abuse, typically reported by district employees or citizens.¹¹⁸ This process and a breakdown of complaint handling will be discussed further below.

INTERNAL AUDIT PROCESS

Risk Assessments

During the examination period, Internal Audit conducted risk assessments as a systematic process to identify and prioritize threats, ensuring the District's resources are focused on the areas of greatest vulnerability.¹¹⁹ In FY23 and FY24, Internal Audit determined risk scores for identified threats by gathering information on risk factors based on interviews with management and leadership within the auditable units,

¹¹⁷ "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 09.30.24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 12.31.24." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 03.31.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 06.30.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "[Jefferson County ARMAC Committee Meetings FY23-25](#)." Kentucky School Boards Association Portal. Retrieved June 1, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>.

¹¹⁸ "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 09.30.24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹¹⁹ "Jefferson County Public Schools Internal Audit Department Audit Plan 2022-23." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2023-24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

as well as reviews of District activities, Board meeting minutes, and other relevant sources. Once Internal Audit scored all auditable units, each was ranked from highest to lowest by risk rating. The results of the risk assessments were evaluated collectively with management requests and used to define the Internal Audit work plan.¹²⁰

In FY25 and FY26, the risk assessment process was revised to include a risk questionnaire and an inquiry into each division's top objectives and related risks. The questionnaire is administered to the Board, the Superintendent's Office, and the respective leadership teams. It aims to identify the top risk areas and potential audits/engagements for inclusion in the audit plan. A list of risk areas was included in the risk questionnaire, and respondents were asked to identify the most significant risk area for their divisions.¹²¹

ARMAC members do not respond to the internal audit risk assessment questionnaire. However, they do contribute meaningfully to the risk assessment process. The primary method of input from ARMAC is through one-on-one discussions with the committee chair, in which risk items are a consistent topic of conversation. Risk perspectives are also gathered during ARMAC meetings and are taken into consideration in the overall assessment.

While the questionnaire serves as the primary structured input into the risk assessment process, it has not been the sole basis for audit planning. Risk assessment draws from a variety of sources, including:

- Results and observations from previous audits and engagements;
- Information provided to internal audit staff via phone, email, and other direct communication, including both anonymous and non-anonymous submissions;
- Onsite visits to schools and facilities, during which concerns and risk items are routinely surfaced;
- Investigative work, which frequently surfaces additional risk areas;
- One-on-one discussions with district staff conducted throughout the year; and,
- Interviews initiated by Internal Audit with individuals in specific auditable units, as well as interviews requested by individuals wishing to provide input or share concerns.

Audit Plans

After completing the Risk Assessment, Internal Audit reviews the top risk areas identified and begins developing the Audit Plan.¹²² The Internal Audit Director must submit an Internal Audit Plan to the senior management and the Board at least annually for review and approval.¹²³ However, the Audit Plan is first submitted to the ARMAC before being submitted to senior management and the Board for final approval.

The Internal Audit Plan must include a work schedule, budget, and resource requirements for the next fiscal year, and is developed based on the ranking of the audit universe using a risk-based methodology with input from senior management and the Board.¹²⁴ The Audit Plan typically consists of five to six audits, including the immediate Audit Plan and the on-horizon Audit Plan. If Internal Audit completes all the immediate Audit Plans, they will move on to the on-horizon audits.

¹²⁰ "Jefferson County Public Schools Internal Audit Department Audit Plan 2022-23." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2023-24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹²¹ "Jefferson County Public Schools Internal Audit Department Audit Plan 2024-25." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Audit Plan 2025-26." Jefferson County Public Schools. Retrieved December 3, 2025. [PDF].

¹²² Ibid.

¹²³ "[Jefferson County Board of Education Policy 04.9 Fiscal Management: Audits.](#)" Jefferson County Board of Education. Published September 2, 2025. Retrieved February 6, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

¹²⁴ Ibid.

Reporting and Distribution

Finding	
3.6	Final internal audit reports (and, as later discussed, Summary Annual Engagement Follow-Up Reports) are not available publicly on a dedicated webpage. Potential benefits of public posting include demonstrating accountability and transparency to the public, building public trust in the oversight function, and potentially reducing the burden of repetitive open records requests.

Upon completion of an Internal Audit, a report is drafted. The Internal Audit Director provides a draft of the internal audit report and conducts an exit conference to discuss findings and recommendations with the division chief(s) and the individuals responsible for the audited process. Recommendations are classified into three categories:

- Observations, which include material noncompliance with regulations, policies, and procedures, as well as fraud;
- Verbal recommendations, which include immaterial noncompliance with regulations, policies, and procedures; and
- Opportunities, which include recommendations for operational efficiency and effectiveness.

Within 15 days of the exit conference and no later than 30 days of receipt of the draft report, the division chief(s) responsible for the audited process must submit a formal written management response to the draft internal audit report. In contrast, for an investigation conducted by the Internal Audit Department, a management response must be submitted within 15 days of the investigative deliverable. The management response must:

- Include responses to all audit recommendations;
- Indicate whether management agrees or disagrees with each recommendation and provide information to support its position in the event that management disagrees;
- Outline the specific corrective actions to be taken to address the findings;
- Provide expected dates for the completion of each corrective action; and
- Identify the individual or department responsible for implementing each action.

Once finalized, both the internal audit report and management response must be distributed to the Superintendent, Chief of Staff, General Counsel, Chief Financial Officer, division chief(s) responsible for the audited process, person(s) responsible for the audited process, Board members, and ARMAC members. The audit report, along with the management response, must then be placed on the agenda of an open Board meeting, and the Board must vote to receive both the report and response within 90 days of issuance.¹²⁵ Final internal audit reports are not currently posted on the JCPS website.

Recommendation	
3.6.a	Released Internal Audit reports with findings, recommendations, and responses (as well as the Internal Audit Summary Annual Engagement Follow-Up Reports) should be posted on the JCPS website and shared appropriately.

Post Issuance

Following the issuance of the final audit report, the recommended roles and responsibilities are as outlined below.

¹²⁵ “Jefferson County Board of Education Policy 04.9 Fiscal Management: Audits.” Jefferson County Board of Education. Published September 2, 2025. Retrieved February 6, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

- The Superintendent's role is to act as the primary executive responsible for responding to and addressing audit findings. Responsibilities specific to the Superintendent include oversight and leadership, resource allocation, coordination and communication, and accountability.
- The Board's role is to serve as the governance body responsible for ensuring the audit process leads to meaningful improvements in the District's operations. Responsibilities specific to the Board include review and formal receipt, oversight and monitoring, policy direction, and accountability.
- While the Internal Audit Director is not the final report recipient in the same way as the Superintendent and the Board, the Internal Audit Director has post-report responsibilities, such as providing more details regarding findings or recommendations at the request of the Board or Superintendent, monitoring the progress of corrective actions and providing updates to the Superintendent and Board, and conducting follow-up audits to verify corrective actions have been implemented.¹²⁶
- ARMAC has no role.

Each internal audit is assigned a number, and the findings database tracks the status of corrective actions and facilitates follow-up on corrective action plans. When management receives corrective action plans that are 90 days past the latest implementation date noted in the corrective action plan, follow-up dates are established. Management is then given 10 business days to provide the status as of the last day of the month.

Ad Hoc Report Requests and Other Deviations from the Process

In addition to planned engagements in the Audit Plan each year, the Internal Audit Director may conduct any audit deemed necessary. The Internal Audit Director must also conduct any audit directed by the Superintendent or the Board. Desired audits by a member of the Superintendent's Cabinet must be approved and officially required by the Superintendent. Those sought by a Board member must be approved upon an affirmative vote of at least four Board members in an open meeting. However, the Cabinet member or a Board member requesting the audit must initiate the audit request directly with the Internal Audit Director and communicate relevant concerns, objectives, and intended outcomes before presenting a formal audit request by the Superintendent or the Board by affirmative vote. Based on the information provided, the Internal Audit Director must assess whether the Internal Audit Department can complete the audit within a reasonable timeframe, has appropriate independence, and has available resources. Based on the Internal Audit Director's assessment, if it is determined that the audit can be completed, the Internal Audit Director must provide a preliminary scope and objective for the audit to serve as a basis for the Board vote or the Superintendent's approval.¹²⁷

During the first two years of the examination period, any significant deviations from the audit plan were to be communicated through one-on-one meetings with the Superintendent's Office and verbally or through presentations during ARMAC meetings. However, starting in July 2024, this process became more formalized in that any significant deviations from the approved Internal Audit Plan must be communicated through periodic activity reports to the Superintendent, senior management, and the Board.¹²⁸

The examination period saw two instances of significant deviations from the audit plan. First, in early FY24, an unplanned assessment was initiated in response to a significant transportation incident. This work fell outside the approved audit plan and substantially reduced capacity for planned audit activities, according to the Internal Audit Director. The deviation was communicated to the Superintendent's Office, the Board, and ARMAC through one-on-one sessions and during ARMAC meetings. Second, in FY25 and FY26, two external assessments related to the district's budget shortfall were facilitated and administered through the

¹²⁶ "[Jefferson County Board of Education Policy 04.9 Fiscal Management: Audits.](https://policy.ksba.org/Chapter.aspx?distid=56)" Jefferson County Board of Education. Published September 2, 2025. Retrieved February 19, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

¹²⁷ Ibid.

¹²⁸ Ibid.

Internal Audit Department, again impacting the ability to complete planned work. These deviations were communicated through one-on-one meetings, ARMAC meeting presentations, and quarterly activity reports, which were available for this period.

According to the Internal Audit Director, minor plan adjustments during the period, such as postponements of individual projects, were also communicated through a combination of quarterly activity reports, ARMAC presentations, and one-on-one discussions as appropriate.

ADDITIONAL PERIODIC REPORTING BY INTERNAL AUDIT

Internal Audit Updates to ARMAC

JCPS Internal Audit provided updates to ARMAC throughout FY23 to FY25. The updates include the work plan status of items accomplished to date, items in process or scheduled, the project status of investigations, and the number of hotline administration reports.¹²⁹ According to the Internal Audit Director, this update is not a standalone report in the traditional sense. It is a presentation that serves as an agenda item for ARMAC committee meetings and is typically uploaded to the Kentucky School Board Association portal as an attachment to the relevant committee meeting materials, where it is accessible in that context to the public.

Internal Audit Quarterly Activity Report

Finding	
3.7	Internal Audit began producing the Quarterly Activity Report in FY25, but this document did not include details about findings or issues noted, nor did it include a breakdown of recommendations or type thereof.

In FY25, Internal Audit began producing Quarterly Activity Reports that included a visualization of the overall Audit Plan status and updates on individual audit and engagement project status (completed, in progress, or upcoming), as well as updates on the status of investigations and monthly monitoring activities.¹³⁰ These reports did not include the number of findings and the type of recommendations made for each completed project, information that may have been of value to the reader.

The Quarterly Activity Reports were shared internally with the following groups:

- Superintendent's Office (including the Superintendent, Chief of Staff, and, starting in FY26, the Superintendent's Special Assistant);
- Members of the Board;
- Members of ARMAC; and
- Members of the Internal Audit Department.

These reports are not available publicly as they may contain sensitive information related to ongoing investigations or preliminary risk items that have not yet reached final disposition.

¹²⁹ "Jefferson County Board and Committee Meetings." Kentucky School Boards Association. Retrieved June 2, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

¹³⁰ "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 09.30.24." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 12.31.24." Jefferson County Public Schools. Retrieved April 11, 2025. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 03.31.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].; "Jefferson County Public Schools Internal Audit Department Quarterly Activity Report Period Ending 06.30.25." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

Recommendation	
3.7.a	The Internal Audit Department should continue preparing the Internal Audit Quarterly Activity Reports, but should consider including additional information, such as findings and recommendations.

Annual Engagement Follow-Up Report

Observation	
3.8	While the first such report was issued after the examination period ended, cataloging corrective actions and the assessment of their implementation status in a report such as the Internal Audit Summary Annual Engagement Follow-Up Report is a step in the right direction toward transparency and holding District officials accountable.

In addition to the individual audit reports and quarterly activity updates, Internal Audit released its first Internal Audit Summary Annual Engagement Follow-up Report on September 17, 2025. The report provides the status of corrective actions for issues identified during prior engagements by the Internal Audit Department. Status updates are presented by the related division (Financial Services, General Counsel, Human Resources, and Operations Services) and project.¹³¹ The Fiscal Year 2025 Summary Annual Engagement Follow-Up Report was provided to the Superintendent's Office, Board, ARMAC, and the Chiefs with high-risk items open over three years.¹³²

Recommendation	
3.8.a	The Internal Audit Department should continue issuing the Internal Audit Summary Annual Engagement Follow-Up Report each fiscal year, and this report should continue to be shared with members of the Board and ARMAC, in addition to the Superintendent's Office and relevant District Leadership.

STATUS OF RECOMMENDATIONS FROM THE 2014 APA SPECIAL EXAMINATION

A finding related to this reporting structure was identified in the May 21, 2014 APA special examination, *Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District*. In that examination, Finding 25 noted, in part, that Internal Audit reported to the Superintendent rather than the Board. The report made numerous recommendations, including that a reorganization should be initiated that would result in the Internal Audit reporting functionally to the Board or to a designated Board committee, and the Internal Audit Director reporting to a senior management official for daily administration, without compromising the independence of the internal audit function. The report also recommended that the Board or designated Board committee perform the annual evaluation of the Internal Audit Director.¹³³ Of these recommendations, all have been implemented, except for the Board or the designated Board committee conducting the annual evaluation of the Internal Audit Director.¹³⁴

Finding 25 also noted that no policies were adopted to govern the internal audit activity at JCPS and recommended that the Board or a Board committee should approve an audit plan developed by Internal

¹³¹ "Internal Audit Summary Annual Engagement Follow-Up Report." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹³² Ibid.

¹³³ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

¹³⁴ "Updated JCPS Audit Response October 9, 2023." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

Audit using the Board's input and guidelines as part of the reorganization and that the Board should develop and adopt a Board policy to guide planning, implementing, and reporting requirements.¹³⁵ All of these recommendations have been implemented.¹³⁶

Finding 26 stated that Internal Audit had not prepared an audit plan or implemented a risk-based audit approach. The report recommended that the Board ensure that Internal Audit policies require the performance of a risk assessment used to develop the annual audit plan, which should address all areas of JCPS and be used to determine which areas should be considered for audit. An audit plan should be submitted to the Board or a designated Board committee for discussion and approval, and to determine the activities to be performed in coordination with the external auditor. It was also recommended to consider whether the risk associated with the school activity funds is sufficient to require two audits annually for each activity fund, or to audit only the high-risk activity funds more than once per year. Further, it was recommended to evaluate the performance of pupil attendance audits to determine whether a more efficient approach exists, such as using staff from attendance data departments to validate pupil attendance processes, leveraging attendance audits conducted by KDE, or other approaches identified.¹³⁷ All of these recommendations have been implemented.¹³⁸

INVESTIGATIONS RELATED TO COMPLAINTS

In addition to executing JCPS's internal audit functions, the Internal Audit Department investigates concerns regarding fraud, waste, abuse, financial misconduct, policy violations with fiscal impact, conflicts of interest, ethical breaches, reporting irregularities, time fraud, misuse of assets, or matters with material control implications. With assistance from a third-party company, the Internal Audit Department is also responsible for managing the Compliance Hotline (hotline). The Internal Audit Department, in conjunction with a few other District departments, is additionally responsible for managing, monitoring, and assessing hotline complaints received.¹³⁹ Details of the complaint process, along with statistics and reports about complaints received and turnaround times for those handled by Internal Audit, are discussed below.

OVERVIEW OF COMPLAINT PROCESS

Complaint Submission

JCPS offers access to a compliance hotline service for employees, students, parents, and other stakeholders to report a variety of concerns about the District.¹⁴⁰ Calls Plus, a third-party company, administered the hotline service for JCPS during the examination period through a 24/7 call center. The call center receives reports either through an online reporting system found on the JCPS website or via a toll-free telephone number.¹⁴¹ Complaints received are classified by the individual submitting the complaint into one of the following incident types:

- Accounting/Audit Irregularities;
- ADA Accommodations;
- Bullying or Harassment;
- Conflicts of Interest;
- Crimes and Threats;
- Cybersecurity Concern;

¹³⁵ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

¹³⁶ "Updated JCPS Audit Response October 9, 2023." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹³⁷ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

¹³⁸ "Updated JCPS Audit Response October 9, 2023." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹³⁹ "Jefferson County Public Schools Hotline Reporting Procedures." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁴⁰ Ibid.

¹⁴¹ Ibid.

- Discrimination;
- Falsification of Records;
- Racial Intolerance;
- Sexual Harassment;
- Theft of Cash, Goods, or Services;
- Vandalism; or
- Violation of Policy

Regardless of the method used to access the hotline service or the type of complaint, the complainant must provide general information about him or herself, parties impacted, and parties responsible, as well as background and details about the incident. The specific set of intake questions asked is dependent on the incident type, with some incident types being asked the same set of questions. Seven question sets have been developed for the thirteen incident types. Also dependent on the incident type is whether an individual can remain anonymous or must provide contact information. Figure 44 shows which types of incidents utilize the same set of questions and which allow the complainant to remain anonymous.

FIGURE 44: QUESTION SET AND ABILITY TO REMAIN ANONYMOUS BY INCIDENT TYPE

INCIDENT TYPES USING THE SAME QUESTION SET	Option to Remain Anonymous
Accounting/Audit Irregularities; ADA Accommodations; and Theft of Cash, Goods, or Services	Yes
Bullying or Harassment	No
Conflicts of Interest; Crimes and Threats; Vandalism; and Violation of Policy	Yes
Cybersecurity Concern	No
Discrimination and Sexual Harassment	No
Falsification of Records	Yes
Racial Intolerance	No

Source: APA, based on data and information provided by JCPS.

An individual filing a hotline report is given a case ID number and an access code. This information allows the individual to review or update information on the online portal and view follow-up notes from the assigned case manager.¹⁴² When the information is submitted, either by the complainant or by Calls Plus staff, the case is automatically routed to Internal Audit for review of the complaint, and an email notification is sent to the employee assigned to the hotline.¹⁴³

Upcoming Change to JCPS Hotline Administrator Vendor

The contract between the Board and Calls Plus was effective January 1, 2019, and remained in effect throughout the examination period. The Calls Plus contract, originally set to expire on June 30, 2026, has been extended to December 2026 due to the need for a longer-than-anticipated implementation period for the new vendor (NAVEX). As a result, Internal Audit will continue the current contract with Calls Plus until NAVEX goes live, at which time the Calls Plus contract will be terminated.

Complaint Assessment

In addition to complaints submitted via the hotline, incidents and allegations to be considered for investigation may originate from emails, phone calls, referrals, and audit observations. Hotline complaints accepted for independent review by Internal Audit are entered into an Investigation Log. At the same time, those received through Calls Plus are tracked and managed in the Calls Plus case management system. If Internal Audit makes an affirmative determination to review a matter independently, the complaint is closed in the Calls Plus system and opened as an Internal Audit investigation in the Investigation Log. For each

¹⁴² "Jefferson County Public Schools Hotline Reporting Procedures." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁴³ Ibid.

allegation, Internal Audit logs: the date received; the reporter, if known; the initial summary; the school/department; the individuals involved; the hotline Case ID number, if applicable; the initial classification; and the preliminary notes.¹⁴⁴

The Internal Audit Director and/or the Risk Investigator performs a preliminary assessment based on the nature, complexity, sensitivity, and timing of the matter to determine the appropriate handling, prioritization, and classification of allegations or concerns received. Preliminary assessments occur in two stages: an initial intake assessment and a secondary risk-based assessment once a matter is accepted for further action.¹⁴⁵

Initial Intake Assessment

Initial preliminary assessments are performed promptly upon receipt of an allegation or concern. The purpose of an initial preliminary assessment is to determine whether the matter falls within Internal Audit's purview, is sufficiently actionable based on the information available, warrants further action by Internal Audit, requires referral to another investigative or oversight entity, or should be closed.

Internal Audit considers various factors as part of the initial assessment, such as the nature of the allegation or concern; credibility and specificity of the information received; the potential financial impact or exposure; the potential non-financial impact; whether the matter appears isolated or systemic; the employment status of the individual(s) involved; sufficiency of information available; and the complainant's stated concerns or intended outcomes, when known. With each decision and rationale being documented in the Investigation Log, the initial intake assessment informs how the matter should proceed.¹⁴⁶ Figure 45 provides further detail concerning Internal Audit's classification of complaint actions.

FIGURE 45: INTERNAL AUDIT CLASSIFICATION OF COMPLAINT ACTIONS

CLASSIFICATION	Description
Full Investigation	Requires a formal plan, interviews, evidence collection, and reporting.
Limited Review	A targeted, evidence-based review with a narrow scope.
Advisory/Monitoring Review	A request for guidance or clarification that is not investigative.
Human Resources Referral	Workplace issues, personality conflicts, or performance complaints.
Compliance and Investigations Referral	Allegations involving Title IX, protected class status, or retaliation.
JCPS Police Referral	Theft, burglary, assault, or criminal activity.
Legal Referral	Active litigation, legal dispute, or claims.
No Action	Insufficient information, outside jurisdiction, or not actionable.

Source: APA, based on data and information provided by JCPS.

Some complaints received may be better addressed by other departments within JCPS, especially when the complaints pertain to criminal matters beyond Internal Audit's scope, workplace behavior issues involving protected classes or discrimination, suspected retaliation, and legal disputes or matters under review that require counsel involvement. While professional judgment should be used to determine to which department a report is to be assigned, generally, student-related complaints should be addressed by the Assistant Superintendent's Office, discrimination or sexual harassment complaints should be addressed by Compliance and Investigations, and crimes and threats, theft, and vandalism should be addressed by Security and Investigations (JCPS Police Department).¹⁴⁷

¹⁴⁴ "JCPS Internal Audit Investigation Procedures Manual." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁴⁵ Ibid.

¹⁴⁶ Ibid.

¹⁴⁷ "Jefferson County Public Schools Hotline Reporting Procedures." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

Internal Audit refers matters to the appropriate JCPS departments for resolution via the Compliance Hotline Action Form, which is emailed to the designated contact person in the intended department for completion and return to Internal Audit within five business days. Once the reported allegations have been thoroughly reviewed or investigated by the department, and a complete Compliance Hotline Action Form has been returned to Internal Audit, the case is ready to be closed. Internal Audit documents this action in the Investigation Log, but the outcomes are not included in the Quarterly Summary of Hotline Complaints.¹⁴⁸

The Investigation Log also documents the rationale for “no action,” which may include insufficient information, outside jurisdiction, or not actionable.¹⁴⁹ Internal Audit does not make referrals to outside entities. When the nature of the complaint should be reported to an outside entity, it is shared with the complainant so he or she can file the complaint with the appropriate entity.

Secondary Risk-Based Assessment

A second preliminary assessment to evaluate risk, urgency, and prioritization is performed once a matter is accepted for further action by Internal Audit. The second assessment considers the magnitude of the actual or potential impact; whether the issue is ongoing; the duration or span of the activity; the number of individuals or programs affected; the need for immediate action to prevent further exposure; and the relative priority compared to other investigations. The assessment guides the sequencing, scope, resource allocation, and timing of the investigation.¹⁵⁰

For any matter moving beyond the initial preliminary assessment, an Investigation Request Summary is completed. This includes the allegations listed individually, the dates of the alleged incidents, the nature/type of potential allegations, the preliminary risk assessment, and the potential violations.¹⁵¹

Complaint Investigation

A formal Investigation Plan should be completed prior to fieldwork. Serving as the foundational planning document, the Investigation Plan is intended to demonstrate the investigator’s understanding of the allegations, risks, objectives, and planned approach and should be completed using an approved Investigation Methodology Document, which records:

- Primary Allegations;
- Defined Scope and Boundaries;
- Investigation Objectives;
- Potential Violations;
- Evidence Strategy;
- Interview Plan;
- Analytical Procedures; and
- Scope Adjustments/Emerging Findings.¹⁵²

Complaint Reporting and Distribution

Unless the scope is minimal, Internal Audit issues written reports in the form of Investigative Memos. The memos typically follow a standard structure, but may vary based on the nature, scope, complexity, and sensitivity of the investigation. While the investigative reports generally include conclusions and

¹⁴⁸ “JCPS Internal Audit Investigation Procedures Manual.” Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁴⁹ Ibid.

¹⁵⁰ Ibid.

¹⁵¹ Ibid.

¹⁵² Ibid.

recommendations, Internal Audit does not recommend disciplinary action, make legal conclusions, or determine criminal guilt.¹⁵³

To protect confidentiality and avoid undue disclosure, the distribution of the investigative memos is based on the professional discretion of Internal Audit. However, the general guidance is that the Investigative Memos may be shared with the requesting party, the relevant assistant superintendent, the subject's supervisor, Human Resources for employee cases, JCPS Police Department for criminal matters, and Legal for litigation or complex cases. Additionally, investigative outcomes may be classified as follows: substantiated, partially substantiated, unsubstantiated, inconclusive, preventative measures taken, control deficiency identified, referred out, or no action.¹⁵⁴

HOTLINE COMPLAINT STATISTICS

Complaints Received by Type

A wide variety of complaints were received through the hotline during the examination period. Figure 46 summarizes the types of allegations, as well as the number of each, received in FY23, FY24, and FY25.

FIGURE 46: SUMMARY OF ALLEGATIONS BY TYPE DURING FY23, FY24, AND FY25

ALLEGATION TYPE	FY23 Number of Allegations	FY24 Number of Allegations	FY25 Number of Allegations
Accounting or Auditing Irregularities	1	2	1
ADA Accommodations	4	1	6
Bullying or Harassment	404	247	213
Conflicts of Interest	9	11	13
Crimes and Threats	38	41	39
Discrimination	26	29	14
Falsification of Records	14	9	4
Racial Intolerance	13	13	9
Sexual Harassment	20	18	6
Theft of Cash, Goods, or Services	4	0	4
Vandalism	2	2	0
Violation of Policy	65	62	53
Total	600	435	362

Source: APA, based on data and information provided by JCPS.

Turnaround Time

During the examination period, the Internal Audit Department had a self-imposed goal of a five-day maximum turnaround time from receiving a complaint to reaching a resolution. Despite this, the average time from complaint to resolution during FY23 and FY24 was greater than five days. Figure 47 shows the quarterly average time to close a report during the examination period.

¹⁵³ "JCPS Internal Audit Investigation Procedures Manual." Jefferson County Public Schools. Retrieved June 2, 2026. [PDF].

¹⁵⁴ Ibid.

FIGURE 47: AVERAGE NUMBER OF DAYS TO CLOSE A REPORT IN FY23, FY24, AND FY25

Quarter	FY23	FY24	FY25
Q1	9 Days	9 Days	6 Days
Q2	9 Days	9 Days	5 Days
Q3	8 Days	8 Days	5 Days
Q4	8 Days	7 Days	5 Days

Source: APA, based on data and information provided by JCPS.

Findings	
3.9	Complaints received through channels other than the hotline, as well as the outcomes of complaints referred to other JCPS departments for investigation, are not included in the Quarterly Hotline Report Summary.
3.10	Currently, the Quarterly Hotline Report Summary is provided only upon request to the Board.
3.11	There is a need for greater visibility and public access on the JCPS website regarding the complaints process, general outcomes, and statistics, as these are currently not publicly available.

PERIODIC REPORTING ON COMPLAINTS

During the examination period, the Internal Audit Director and Risk Investigator provided a Quarterly Hotline Report Summary to the Superintendent for each of the twelve quarters. A copy of the report was also routinely provided to the Chief of Staff, members of ARMAC, and the Chief of Schools. These summaries typically present hotline reports or allegations broken down by various factors, such as by location, type, outcome, and reporter. In addition, some summaries provided an overview of substantiated reports or highlighted specific types of incidents such as bullying or harassment.

Internal Audit does not monitor the status of cases referred to other departments for investigation, nor does it monitor their outcomes. Other departments, such as JCPS Police Department and General Counsel, do not follow the same policies and procedures as Internal Audit does, and it is unclear to Internal Audit Department staff how referrals are handled under their supervision. According to staff, some departments are more consistent than others when submitting completed Compliance Hotline Action forms. This overall lack of formalized coordination across departments has led to the exclusion of the outcomes of referred hotline reports cases from the outcome sections of the Quarterly Hotline Report Summary.

The reports were provided to the Board only upon request and were not made publicly available on the JCPS website. Although the Internal Audit Department believes it would be beneficial to make these reports publicly available, they have not been added to the website despite discussions having occurred about doing so.

STATUS OF FINDINGS FROM THE APA'S 2014 JCPS EXAMINATION REGARDING COMPLAINTS

One of the 45 findings outlined in the *Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District* report concerned the reporting and monitoring of hotline complaints. Finding 27 noted that policies were not developed to investigate, monitor, or report hotline complaints, and the oversight responsibility for the process was not assigned.¹⁵⁵

The report recommended developing policies to be approved by the Board regarding the hotline to establish a consistent process for improving and documenting procedures for assigning, investigating, monitoring,

¹⁵⁵ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

resolving, and reporting various concerns and complaints, including those involving potential fraud and abuse. It was further recommended that the Internal Audit Director be assigned responsibility for managing the hotline, with complete access to all complaints, and have the responsibility of determining with whom to discuss the issue to gather additional information or input, how to handle the issue, the assignment of an investigator, whether the issue was investigated promptly, the method of reporting the issue, and whether the summary report is complete. It was recommended that the summary report include the information needed by those reviewing the data to provide full disclosure, and that it be periodically provided to the Board or a designated Board committee to ensure its awareness of any significant information in these complaints and the subsequent investigation. It was also recommended that the JCPS website be updated to make the hotline more accessible to employees and the public by placing it on the homepage. It was recommended that written procedures be required for all complaint systems used by all JCPS departments to document the expected investigation, monitoring, and reporting activities. Finally, it was recommended to reevaluate whether the additional systems should be discontinued, to provide a single point of contact for complaints, and to maximize use of the vendor-operated hotline.¹⁵⁶

Of these recommendations, all have been implemented except that the summary reports, or quarterly summaries of hotline reports, are not periodically provided to the Board or a designated Board committee. Instead, they are provided to the Superintendent and, upon request, to the Board.¹⁵⁷

Recommendations	
3.9.a	JCPS Internal Audit Department staff should ensure that the results of their investigations of complaints, allegations, and incidents arising outside of the hotline intake process are included within the Quarterly Hotline Report Summary.
3.9.b	JCPS Internal Audit Department staff should work with those assigned to investigate complaints referred to other JCPS departments to incorporate the results of that work within the Quarterly Hotline Report Summary.
3.10.a	JCPS should provide the Quarterly Hotline Report Summary prepared for the Superintendent to members of the Board on a routine basis.
3.11.a	JCPS should increase the visibility of the link on the district website for reporting complaints, allegations, or incidents. JCPS should also consider periodic reminders to stakeholders about the availability of this mechanism for reporting concerns.
3.11.b	JCPS should consider uploading the Quarterly Hotline Report Summary to the Internal Audit Department section of the district website to enhance transparency.

¹⁵⁶ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

¹⁵⁷ Ibid.

CHAPTER 4: FINANCE

FISCAL OPERATIONS AND CONTROLS OVERVIEW

Finance Staffing Structures

Jefferson County Public Schools (JCPS) organizes its finance staff under a Chief Financial Officer (CFO), who reports to the Superintendent. The CFO has four Executive Administrator direct reports who each oversee a department and team of staff across four areas:

- **Budget:** Manage District budget and fiscal forecasting.
- **Accounting:** Manage accounts payable, revenue, grants and awards, and cash flow financial statements.
- **Purchasing:** Process requisitions, purchase orders (PO), and facilitated bids for contracted services.
- **Payroll:** Process payroll for JCPS staff.

The Executive Administrators are responsible for their functional area and are not cross-trained experts in the other areas; however, Department staff reported frequent collaboration through shared processes. The separation of duties is intentional and aligned with best practice in internal controls and risk mitigation.

- For example, the Payroll Department was intentionally placed under Finance, not Human Resources (HR). This ensures checks and balances between the staff responsible for people management in HR (hiring, benefits, etc.) and the staff responsible for processing paychecks in Finance.
- Another example is the Purchasing Department processes POs to procure goods and services, but the Accounting Department manages payments to the vendors.

The exam team found the general financial organizational structure and separation of duties to be in line with best practice.

Beginning July 1, 2026, under the approved organizational structure changes proposed by Superintendent Yearwood, a Chief Business Officer will oversee District financial functions and staff. Recommendations that reference “Finance staff leaders” refer to the Chief Business Officer and relevant senior-level Finance staff reporting up to the Chief Business Officer.

ACCOUNTING AND PAYROLL

The Accounting Department has sound practices in place regarding use of purchase cards (p-cards or credit cards) and the reconciliation process. Finance leadership reported that a limited number of JCPS staff (20-25 staff total) have access to a District credit card. Finance staff described a process by which at the end of each month, the Accounting Department downloads the statement for each credit card. Those statements are then sent to the department or person responsible for charges who then sends all the receipt data back. Procurement specialists review and verify that all documentation has been provided. Based on the reported limited number of credit cards issued and the thoroughness of the purchase review processes described by staff, the exam team did not identify any risks regarding p-card processes.

A risk identified by the Finance Division was that many staff were near retirement, particularly in the Accounting Department. The Accounting Department is taking proactive steps to document Standard Operating Procedures (SOP) used by longstanding staff or staff who had niche roles (meaning they were specialized and only a few or none of their colleagues understood how to do the work) to help ensure knowledge transfer and cross-training, where needed. The exam team believes this proactive approach of documenting SOPs to be a smart step in support of continuity of work and succession planning.

The exam team did not have any findings or recommendations directly related to the Accounting or Payroll Departments.

PURCHASING

JCPS procures goods and services in accordance with local public agency provisions of the Kentucky Model Procurement Code KRS 45A.345 to 45A.460.¹⁵⁸ The Jefferson County Board of Education (JCBE or the “Board”) first adopted procurement regulations in 1980 and most recently updated them in 2023.¹⁵⁹ The Purchasing Department within the Finance Division manages procurement and processes requisitions and POs for all contracted services in the District. The General Counsel’s office plays a supporting role in the legal aspects of contracting for the District, including training staff and providing contract documentation review.

The exam team conducted a review of the JCPS purchasing, procurement, and contract-related guidance, trainings, and processes. A sample of POs and contracts was also reviewed.

Contracting Processes & Procurement Rules

Contract Training

Observation	
4.1	JCPS General Counsel training on contracting began recently in 2024-25 and is not yet required for all staff who are involved in any aspect of the contracting process, nor is it integrated with Purchasing Department procedures.

According to interviews with General Counsel office staff, beginning in 2024-25, the General Counsel’s office started providing training for staff on contracting.

Two types of contract trainings are offered:

1. An in-depth contract training for staff who write contracts; and
2. General contract training for school building administrators, including Principals, Assistant Principals, and sometimes counselors or other staff involved in contracting. This is a required training in which all buildings must be represented.

According to General Counsel staff, the training PowerPoints are posted on an internal JCPS staff site so that staff can view the trainings at any time. The trainings are not posted on the public website. In interviews, the General Counsel’s office staff expressed their plans to conduct those trainings on an annual cycle in the future. The exam team recommends that the General Counsel’s office conduct mandatory annual training for all staff who are involved in any aspect of the contracting process. Training participation should be tracked so the District has data on who received training and when.

Recommendations	
4.1.a	The Purchasing Department should link to or integrate the General Counsel’s contracting training within the Purchasing webpage information to support streamlined communication and resources for staff around purchasing procedures.
4.1.b	General Counsel’s office should conduct mandatory annual training for all staff who are involved in any aspect of the contracting process and track participation data.

Types of Contracts

Figure 48 shows an excerpt from the General Counsel’s Office contract training outlining different types of contracts and agreements. In addition to a professional services contract (commonly referred to simply as

¹⁵⁸ “[Procurement Regulations/Model Procurement](https://www.jefferson.kyschools.us/page/purchasing).” JCPS Purchasing. Retrieved January 12, 2026.
<https://www.jefferson.kyschools.us/page/purchasing>.

¹⁵⁹ Ibid.

a “services agreement” or “contract for services”) and Memorandums of Agreement (MOA) or Memorandums of Understanding (MOU), JCPS also uses Data Memorandums of Agreement (Data MOA) and Data Privacy Agreements (DPA) when needed. The term “contract” is used broadly in this chapter inclusive of all aforementioned types of contracts.

FIGURE 48: JEFFERSON COUNTY PUBLIC SCHOOLS TRAINING - WHAT KIND OF CONTRACT OR AGREEMENT DO I NEED?

Professional Services Contract	MOA/MOU	Data MOA	Data Privacy Agreement
• A PSC is used to purchase of a professional service • A professional service is something where we are relying on the skill or expertise of the vendor, and different vendors are not interchangeable. For example, an artist or a professional development speaker • A PSC is a purchase. JCPS’s obligation is to pay the vendor. The vendor performs the services.	• An MOA or MOU is used when there is a partnership. • Both the external party and JCPS have some duties or obligations. • There may be a cost, or there may be no cost.	• A Data MOA is used when there is a partnership and we will be providing data to the vendor. • If we will be pulling data reports or providing a significant amount of data to the vendor, there should be a Data MOA. • Data MOAs do NOT apply where the data is being shared through a digital resource • Data MOAs require coordination with ARSI	• A DPA is used when we are procuring a digital resource and will be sharing data through that resource • This may be software, an app, or a browser extension • The data is automatically shared by the digital resource directly to the vendor’s systems. • DPAs are the final result of the Digital Resource Review Process. Blank DPAs come from the Digital Resource Team

Source: Jefferson County Public Schools Contract Training.

As the training noted, and as described by General Counsel staff and other staff who frequently work with contracts and MOAs, most staff generally understood the biggest difference between professional services contracts and MOAs to be:

- MOAs are typically used when partnering with a nonprofit or community-based organization; and
- MOAs are often used when both the partner and JCPS have tasks and obligations they must fulfill.
- Professional Services Contracts should be used when JCPS is making a straightforward purchase, buying something offered by a vendor.

According to the Kentucky Procurement Manual, a MOA is a contractual method utilized when the Commonwealth is entering into a contract with another public entity or a not-for-profit (501(c)3) corporation to perform a governmental function.¹⁶⁰

Data MOAs are rare, according to the training documents, and only necessary when JCPS provides data to a vendor.

The training notes that Data Privacy Agreements (DPAs) should be used to outline the cybersecurity and privacy protections that must be in place for procured digital resources through which data will be shared.

¹⁶⁰ [The Commonwealth of Kentucky Procurement Manual](https://finance.ky.gov/eProcurement/ResourcesSupport/Kentucky%20Procurement%20Manual.pdf).” Finance and Administration Cabinet Office of Procurement Services. Revised March 11, 2024. Retrieved January 12, 2026.
<https://finance.ky.gov/eProcurement/ResourcesSupport/Kentucky%20Procurement%20Manual.pdf>.

Analysis of Sample of Contracts

Findings	
4.2	Purchasing procedures have not been adhered to consistently, which has resulted in reported instances of vendors performing services prior to JCPS staff obtaining requisitions.
4.3	In multiple instances, JCPS did not document due diligence and justification for sole source contracts meeting Kentucky Model Procurement laws related to noncompetitive negotiations.

Observation	
4.4	The name and format of the Data Privacy Agreement (DPA) template is confusing, as it serves as a contract that includes terms for data privacy.

In July 2025, the exam team requested documentation from JCPS regarding a sample of 13 vendors not supported by a contract publicly available through the JCPS purchasing webpage. The request focused on FY25 top spend vendors with contract values of approximately \$2M or greater. The documentation requested and received is summarized in Figure 49.

As of November 2025, the bids and contracts page on the JCPS website did not have any documents posted and did not have any narrative explaining why the webpage was empty. It was unclear as to the purpose of the webpage.

FIGURE 49: CONTRACT DOCUMENTATION SAMPLES

Documentation Requested from Jefferson County Public Schools	Received by Exam Team
Copy of the contract (with addenda, when applicable)	Received for 10 of the 13 vendors. For the remaining three, only POs were provided.
Request for Proposal (RFP) or other solicitation	Received for one of the 13 vendors. Only one of the 13 vendors competitively bid for their JCPS contract.
Sole source documentation with justification (when applicable)	Of the ten contracts cited as sole source (not competitively bid - contract awarded directly to a vendor), the exam team received a letter from a vendor for one contract describing their proprietary product as justification for sole source procurement. No internal JCPS documentation of sole source justification or determination created at the time of the purchase approval was provided for any of the ten sole sourced contracts.
Statutory exemption from the bid process (when applicable)	Received a narrative explanation describing the purchase and relationship for all 13 vendors. Twelve explanations claimed various statutory exemptions from bid process. These narrative explanations appear to have been created extemporaneously as part of the exam documentation request.
Bid tabulations or other documentation supporting the selection of the vendor	For the one contract competitively bid (out of the 13 contracts in the sample), the exam team received a

	list of competing vendors and selected awardee(s). The document did not include scoring or notes.
Cost proposals for all bidding/competing vendors	Received seven quotes – all from vendors providing curriculum or technology-related products. No quotes or cost proposals were received for the remaining six vendors.
Contract performance analysis and metrics	Received none.
Former vendor and contract/agreement replaced if the contract replaced another vendor since June 2021	Received none. Unknown if applicable.

As shown in Figure 49, the exam team did not receive all contract and procurement documentation related to the sample, as requested. Notably missing were copies of several contracts, sole source determination documentation, and contract performance and outcome metrics. Based on the exam team's analysis outlined below regarding gaps in procurement procedures, it is presumed that some of the documentation requested does not exist or was not retained.

In addition to the documentation provided and outlined in Figure 49, JCPS also submitted copies of POs, including a sampling of different kinds of purchases from the same vendor to show the variety of products or services purchased under a contract.

The sample of vendors analyzed is broken down by contract type in Figure 50.

FIGURE 50: VENDORS BY CONTRACT TYPE (FY25 TOP SPEND VENDOR SAMPLE)

CONTRACT TYPE	Number of Vendors in Sample
Professional Services Contract	5
Memorandum of Agreement (MOA)	2
Data Privacy Agreement (DPA)	3
Unknown (Only PO provided in documentation)	3
Total	13

Observations regarding contract format include:

- The contracts in the sample varied from detailed descriptions of services to only broad, general overviews with little detail.
- In most cases, the contract format type (professional services contract, MOA, etc.) appeared to align with JCPS and the Kentucky Procurement Manual contract type guidelines.
- In one case, a contract was structured as a professional services contract rather than an MOA, despite it being with a community based nonprofit organization and requiring both the vendor and JCPS to provide services (criteria that meets District MOA contract format guidelines).
- In several cases, a DPA was used as the contract format. The DPA covers both the data privacy terms and conditions as well as the services description, timeline, and compensation. The "Data Privacy Agreement" titling was confusing to the exam team, since the document not only outlines data privacy terms, but also functions as the actual contract with the vendor. A retitling or reorganization of the contents of the DPA may provide clarity for users.

Figure 51 shows a breakdown of the sample of vendors by procurement method.

- One vendor represented a contract that was competitively bid directly from a JCPS procurement.

- Two vendors were approved through state-level contracts or cooperatives, a procurement strategy that can result in efficiencies in time and cost.
- The remaining ten vendors in the sample were sole source contracts. The sole source documentation and justification as well as the description of the statutory exemption from the bid process appeared to be simple narrative explanations drafted ad hoc for the exam team, rather than documented written explanations from the time of the requisition.

FIGURE 51: VENDORS BY PROCUREMENT METHOD CITED (FY25 TOP SPEND VENDOR SAMPLE)

PROCUREMENT METHOD USED	Number of Vendors in Sample
Competitively Bid	1
Purchased using an existing State contract or Cooperative	2
Sole Source (Copyright Materials)	6
Sole Source (Education Specialist)	2
Sole Source (MOA with Community-Based Organization)	2
Total	13

Gaps in Procurement Procedures

When questioned about gaps in procurement procedures, many stakeholders, including Finance and Internal Audit staff, as well as District leaders and the Audit and Risk Management Advisory Committee (ARMAC) chair, cited concerns. Central Office administrators noted several areas where JCPS needed to tighten up their processes. One gap was related to how JCPS determined conditions for noncompetitive negotiation for contracted services.

Kentucky Model Procurement law under KRS 45A.380 outlines the terms for “noncompetitive negotiation” as follows:

A local public agency may contract or purchase through noncompetitive negotiation only when a written determination is made that **competition is not feasible** and it is further determined in writing by a designee of the local public agency that: (1) An emergency exists which will cause public harm as a result of the delay in competitive procedures; (2) There is a single source within a reasonable geographical area of the product or service to be procured; (3) The contract is for the services of a licensed professional, such as attorney, physician, psychiatrist, psychologist, certified public accountant, registered nurse, or educational specialist; a technician such as a plumber, electrician, carpenter, or mechanic; or an artist such as a sculptor, aesthetic painter, or musician, provided, however, that this provision shall not apply to architects or engineers providing construction management services rather than professional architect or engineer services[.]

According to District Finance leaders, under noncompetitive negotiation model procurement rules, JCPS had missed one word for many years – “feasible.” Sole source has been used for some of the District’s largest contracts in recent years according to District staff. Per the exam team’s sampling:

- The narrative explanations describing the sole source exemption from the bid process for the sample of contracts reviewed referenced some conditions allowable under KRS 45A.380, such as emergency pandemic needs, purchase of copyrighted materials, or hiring an education specialist. However, those narrative explanations were produced for the exam team after the determination and contracting period.
- The determination for the sole source exemptions were not documented at the time of contracting, leaving no trace of due diligence.
- Quotes were only provided for the seven vendors providing curriculum or technology services under a Data Privacy Agreement. No evidence of quotes or bids were provided for the remaining vendors in the sample.

According to Finance staff, due diligence to determine appropriate conditions for sole source contracts was conducted but not well documented. Administrators described a need to improve their due diligence processes and documentation. Planned improvements include ensuring that competition is truly not feasible, sole source criteria is met, and the due diligence and supporting evidence is documented in writing.

In fall 2025, JCPS began to make changes to address these issues related to non-competitive procurement. The October 20, 2025 JCBE Policy Committee Meeting minutes included a recommendation for “a new administrative procedure that provides guidelines for the use of non-competitive negotiations for contracts and purchases.”¹⁶¹ As of November 2025, the JCPS Purchasing webpage included new information on “Determination and Findings”, requiring “written, signed, legally binding statements, submitted by an employee, to explain/justify the method and logic that they have used to select material, services, or suppliers when committing federal, state, or district funds for purposes of procurement of non-bid materials or services.”¹⁶² A “Non-Competitive Determination Explanation” form, dated November 2025, was linked from the same webpage. The form required documented evidence for all contracts and purchases or products at any dollar amount for how the determination was made that the vendor qualified for noncompetitive purchasing. Specifically, the form asks requisitioners to provide written explanation documenting efforts to find other vendors who provide similar services or products, a list of services and products reviewed, and attributes that made the selected service or product different. The documentation is required to be attached to contracts during the routing processes for approvals and attached to the requisition for purchases for all services and products using noncompetitive purchasing.

The exam team’s recommendation aligns with this new, required form. Appropriate oversight by a trained staff member, such as the Purchasing Director or General Counsel’s Office, should review these non-competitive determination explanations to ensure alignment with statute and procedure. Additionally, all purchasing documentation for every requisition should be saved and accessible in a central, digital format — ideally using commercial off-the-shelf contract management software to help ensure that all required steps are completed and documentation is saved.

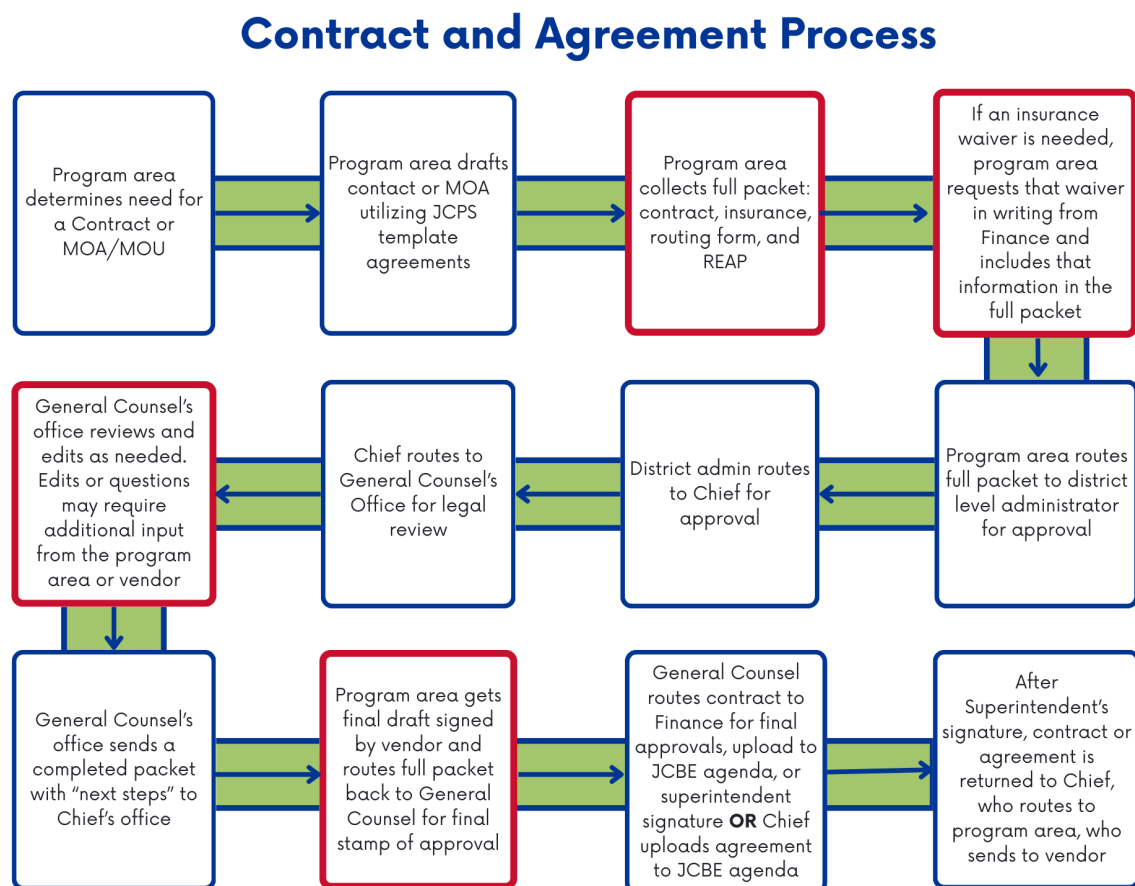
Contracting Process

When completed in appropriate sequence, the contracting process with a selected vendor should begin following the completion of formal procurement procedures for goods and services. Figure 52 shows an excerpt from the Fall 2025 version of the General Counsel’s contract training, outlining the established JCPS process for getting a contract in place from initiation to approval, following procurement. The process allows for the idea and initial request for a contract to come from any program area in JCPS. Although it does require that a district-level administrator and the Chief over the initiating program area approve the request, it does not have to originate with someone in a leadership role.

¹⁶¹ “[October 20, 2025 JCBE Policy Committee Meeting Minutes](https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89).” Retrieved March 10, 2026.
<https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

¹⁶² “[Determination and Findings Information](https://www.jefferson.kyschools.us/page/purchasing#determination).” JCPS Purchasing. Retrieved November 2025.
<https://www.jefferson.kyschools.us/page/purchasing#determination>

FIGURE 52: CONTRACT AND AGREEMENT PROCESS



Source: Jefferson County Public Schools General Counsel.

Staff reported that what commonly occurred in practice during Superintendent Pollio's tenure was that a program area would initiate an idea and verbally funnel the request up to its Chief through chain of command. The Chief would then discuss it with the Superintendent, who would give an informal "yes" or "no" to indicate the likely approval decision that would come at the end of the formal process. The model relies on Chiefs and the Superintendent both knowing how much funding is available in their area of the Board-approved budget and approving spending that was within the Board-approved budget. The model assumes that all sign-offs and approvals in the process will occur from start to finish before any vendor services begin.

The process appropriately has multiple levels of approval required — from District-level administrator to Chief, to Superintendent, and to Board of Education. The process requires a legal review of the contract from the General Counsel's Office. It also requires approval from Finance for the contract to be entered as a requisition and PO to approve spending of funds. The Finance Division's step in the process provides the administrative structure that needs to be in place for vendors to be able to invoice and be paid. It is also a step designed to confirm that funds are available and have been budgeted prior to going to the Board of Education for final approval.

Issues Reported with Contracting Process

According to staff interviewed, one of the ways the process broke down in the past was through steps occurring out of sequence. Finance staff reported instances of vendors and partners commencing services prior to JCPS staff completion of all contracting process steps. According to Finance staff, this practice resulted in vendors rendering services and invoicing the District prior to a requisition and PO being in place.

Purchasing Department staff reported that when they saw contract services commenced before a formal PO had been created, they reported the instance to the supervisor of the individual who violated the procedure. Purchasing staff were not aware of any instances where disciplinary measures had been taken for these procedure violations.

Need for Contracting Management System

In their 2024-25 Audit Plan, Internal Audit included plans to, “assess the effectiveness of the internal controls within the process for approval of MOUs/MOAs.”¹⁶³ In accordance with the issues identified by Internal Audit in that review, the General Counsel’s Office and the Finance Division cited the need for a robust contract management system.

According to General Counsel, a contract management system implementation had not occurred due to budget constraints. Benefits of the system, noted by staff, would include a central repository of all contracts and related documentation so that all Central Office and school-based staff would have better access to the contracting details and process and to have one “source of truth.” Staff noted a contract management system would also support contract negotiation more directly and ease the burden on schools.

Recommendations	
4.2.a	JCPS should procure and implement a robust contract management system where all purchasing documentation for every requisition can be saved and accessible in a central, digital format, and workflow processes and approvals can be documented and transparent in real-time.
4.3.a	JCPS should require a written bid from every vendor with whom the District enters a contract relationship, including sole source procurements. Written bids should provide cost detail and disclose planned use of subcontractors, when applicable.
4.3.b	The Purchasing Department should implement updated procurement procedures to appropriately document non-competitive negotiation conditions for sole source contracts prior to going to Board for approval.
4.3.c	An appropriate trained staff member, such as the Purchasing Director or General Counsel’s Office, should review all non-competitive determination explanations for sole source contracts to ensure alignment with statute and procedure.
4.4.a	JCPS should consider retitling or reorganizing of the contents of the DPA to provide clarity for users regarding its function as a contracting tool with terms for data privacy.

Contract Administration and Performance

Finding	
4.5	The District lacks processes for contract administration and performance oversight.

Internal Audit identified vendor performance oversight as an area of risk for the District. In its FY26 Audit Plan, Internal Audit included plans to assess the District’s oversight of vendor performance for professional service contracts, including how the District verifies supporting documentation before paying vendors and how the District confirms that vendor services align with scope/deliverables. To conduct this assessment, Internal Audit will review a “judgmental sample of high-dollar vendors.”¹⁶⁴

Based on the exam team’s analysis, JCPS lacks contract administration and vendor performance procedures for staff (including program managers and Chiefs) who oversee contracts. Staff noted that contracts often lacked detail in the description of services, deliverables, metrics, and costs, making it difficult to understand the scope and scale of what vendors were supposed to do for JCPS and the impact those

¹⁶³ “Jefferson County Public Schools Internal Audit Department Audit Plan 2024-25.” Published August 2024. [PDF]

¹⁶⁴ “Jefferson County Public Schools Internal Audit Department Audit Plan 2025-26.” Published August 2025. [PDF].

services were expected to have. This assertion was confirmed by the exam team in the vendor sample review.

JCPS also does not have a documented centralized contract oversight process, resulting in a lack of clarity about who is responsible for assuring contract performance and what guidelines should be followed. Clerks in the Purchasing Department are responsible for entering contract requisitions and verifying service completion to facilitate payment processing. However, the clerks are not tasked with contract oversight, nor do they possess in-depth knowledge of the services provided. Contract administrators are supposed to monitor vendor performance; however, the District lacks formal expectations and guidelines for what contract administrators are held accountable to.

There is not a uniform process or set of expectations for staff to establish Key Performance Indicators (KPIs) or other goals and metrics for services performed by vendors and partners under contracts and MOAs. Staff noted the lack of strong metrics associated with vendor contracts resulted in lack of transparency and accountability for how funds were spent and what the Return on Investment (ROI) was for the District.

The Council of Great City Schools (CGCS) in its “Best Practices in Urban Public School Procurement: Guidelines, Standards, and Lessons” advise that KPIs should be defined in the RFP for services, should align to district strategic goals, should be monitored by the district through independent data collection that validates performance measures reported by the supplier, and should be manageable so the supplier can focus on performing the services contracted as opposed to spending inordinate amounts of time creating reports.¹⁶⁵ These practices were not evident in the vendor contract sample review conducted and discussed above.

It was unclear to the exam team whether or how much information JCBE typically received regarding contract and vendor performance, as new and renewing contracts were typically included on the Board’s consent agenda (which typically functions as a batch of items requiring a single approval rather than individual item approvals).

As of fall 2025, JCPS reported to the exam team that the District has identified gaps related to contract performance oversight and is working to address it. The timeline for implementing changes is unknown. Preliminary components of its work to improve in this area were shared and described as:

- Updates to required contract components, including what details should be included in the description of services and a listing of expected deliverables upon which the ROI would be measured
- Ethical standards that contract administrators will be accountable to
- Examples of what contract oversight should look like
- Updates to required detailed data that vendors must submit with itemized invoices

The exam team commends these planned improvements, which align with the recommendations detailed below.

¹⁶⁵ “Best Practice in Urban Public School Procurement: Guidelines, Standards, and Lessons.” The Council of Great City Schools. Published October 2018. [PDF].

Recommendations	
4.5.a	JCPS should develop systems and processes for contract performance oversight, indicating who will be held accountable for District spending, processes for evaluating vendor performance, and how vendor performance and contract outcomes will be reported to the Board.
4.5.b	JCPS should implement the planned updates to the contract administration process, including: • Use of metrics and KPIs in both the RFP and contract services description outlining expectations for vendors upon which their performance will be measured • Vendor costs should be detailed and transparent in proposal/quote and invoicing • Use of a thorough description of services in the contract • Written ethical standards and oversight expectations that contract administrators will be accountable to • Itemized invoice formatting
4.5.c	JCPS should update contract trainings and contract templates to include updated administration and oversight expectations.
4.5.d	JCPS should provide vendor performance metrics to the Board as part of the contract renewal approval process.

BUDGET

The JCBE Budget Planning and Adoption Policy 04.1 states, “the annual operating budget of the District is a plan that defines the allocation of resources to support costs of the program of public education approved by the Board.”¹⁶⁶ The day-to-day management of the budget occurs in the Budget Department within the Finance Division. The Chief Financial Officer (CFO) oversees an Executive Administrator of Budget. Under the direction of the Superintendent, the CFO and Budget staff develop and present budgets to the JCBE for approval on an annual cycle. The Board votes and approves budgets, and as stated in the JCBE Fiscal Management Policy 04.0, “The Board recognizes the importance of adequate financing and efficient use of funds in the operation of the District under its management and control and shall utilize all available financial resources to support the schools.”¹⁶⁷

The sections that follow explain how the JCPS budget is developed, where the District’s money comes from, how individual schools get money, how the District decides what to spend money on, and how the District found itself in a major budget deficit.

Budget Cycle

The JCPS budgeting process follows an annual cycle in accordance with KRS 160.470(6)(a), outlined in Figure 53. There are three stages of development through which the JCPS administration and the Board develop, review, and approve the District’s budget with increasing accuracy:

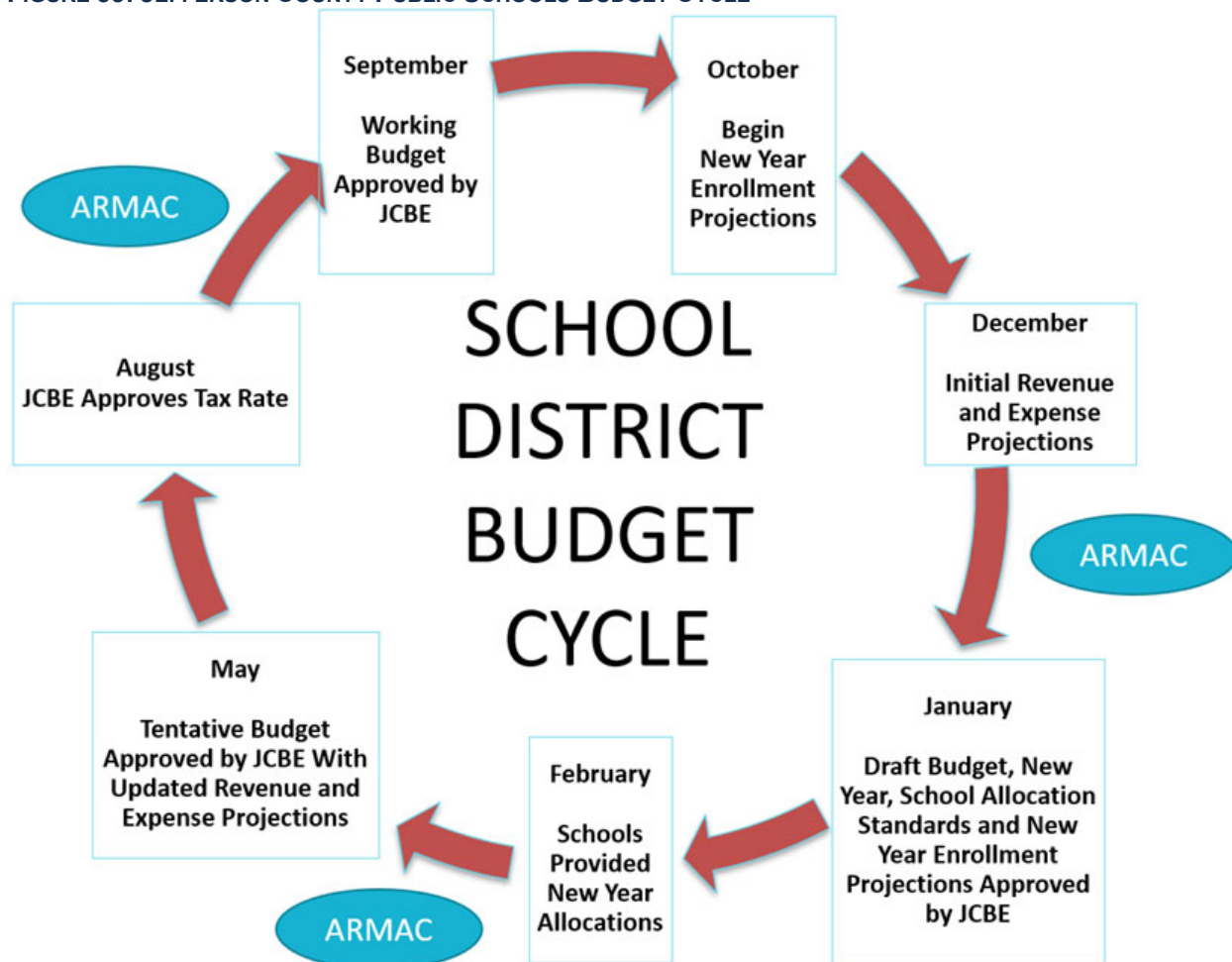
- **Draft Budget in January:** Includes the Board’s approval of the school staffing allocation standards based on the enrollment projections.
- **Tentative Budget in May:** Builds a more accurate account of the Draft Budget through comparison to prior year’s actual expenses.
- **Working Budget in September:** Based on revenue projections, including the Annual Tax Rate Hearing, any remaining Fund Balance from the prior year, and state and grant funding.

¹⁶⁶ “[Jefferson County Board of Education Policy 04.1 Fiscal Management: Budget Planning and Adoption](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended December 9, 2025. Retrieved January 28, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

¹⁶⁷ “[Jefferson County Board of Education Policy 04.0 Fiscal Management](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended December 13, 2022. Retrieved January 28, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

Once the Board approves the (final) Working Budget presented by the Superintendent in September, they do not see updated revenue and expense projections until the following May, when they approve the Tentative Budget for the following fiscal and school year.

FIGURE 53: JEFFERSON COUNTY PUBLIC SCHOOLS BUDGET CYCLE



Source: Jefferson County Public Schools Finance Division.

Funding

School districts receive federal, state, and local funds to operate. These funds represent revenue for the District and are divided into fund categories. In 2023-24 (the most recent year of funding data available from KDE), approximately 13% (\$270M) of all funds received by JCPS were federal, 30% (\$607.7M) were from state sources, and 50% (\$1.02B) from local sources. The remaining funds were from other sources or represented fund transfers in.¹⁶⁸

The majority of revenue that comes into JCPS goes into the General Fund. Discussion in this report regarding the budget is primarily focused on the General Fund. The different types of funds, including the General Fund, are described below. For a detailed breakdown of revenue and expenditure data from the

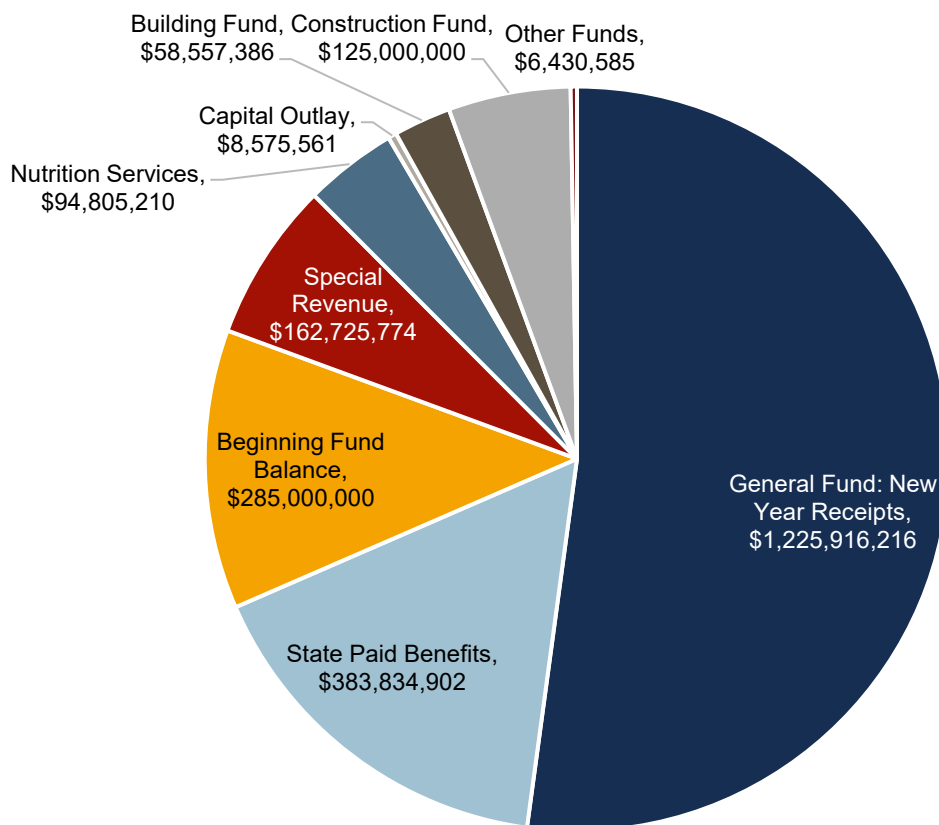
¹⁶⁸ "Report Card Dashboards: Jefferson County." Kentucky Department of Education. Published May 15, 2025. Retrieved January 8, 2026. <https://reportcard.kyschools.us/kysrc?organization=20232024:275:275000&sid=009b1e23-33f1-86ce-ac11-3a12a9c336c3&gid=67860f32-fdaf-6a21-06b5-3a12fc211b31>

District's Annual Comprehensive Financial Statement (ACFR), please refer to **APPENDIX B: FY23-25 Revenue and Expenditure Overview**.

Fund Categories

Figure 54 shows the FY26 total Working Budget of \$2,350,845,634 and how the funds are divided into fund categories.

FIGURE 54: FY26 TOTAL WORKING BUDGET FUND CATEGORIES



Source: Jefferson County Public Schools FY26 Working Budget.

General Fund

General Fund revenue is the largest component of the JCPS Working Budget. In FY26, the General Fund (inclusive of New Year Receipts and State Paid Benefits as shown in Figure 54) represented 80.5% (\$1,609,751,118) of the JCPS Working Budget.¹⁶⁹ The General Fund, as described in the FY26 Working Budget, is where the Board has the greatest flexibility in how they decide to use money to impact students.¹⁷⁰

The General Fund revenue comes from:

- Local Revenue: Property and occupational taxes
- State Revenue: Support Education Excellence in Kentucky (SEEK) funds and state-paid benefits

¹⁶⁹ "Jefferson County Public Schools FY 2025-26 Working Budget Report." Jefferson County Public Schools. Retrieved September 2025. [PDF].

¹⁷⁰ Ibid.

- Federal Revenue: Permissible “indirect costs” associated with federal grants¹⁷¹

The General Fund also includes the balance of leftover funds from the prior year—known as the Fund Balance (described in the **Cash Flow in the General Fund** section below).

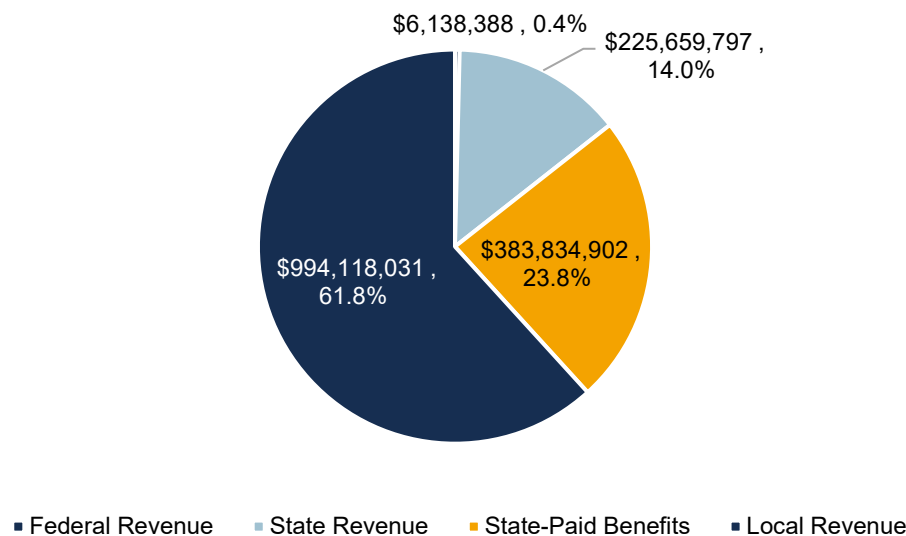
Categorical and Self-Sufficient Funds

The other funding categories that make up the remaining portion of the total Working Budget (19.5% in FY26) are comprised of categorical and self-sufficient funds. Categorical funds must be used for specific categories of students, programs, or purposes determined at the state or federal level. For example, Capital Outlay, Building, and Construction Funds can only be used for capital improvements and collectively make up only 8.2% of the FY26 total working budget. Other funds, such as Nutrition Services, are supported by reimbursements of expenses and are self-sufficient, not requiring any local support to sustain services to students.¹⁷²

Local Revenue

The JCPS budget is made up primarily of local funds that come from property and occupational taxes. Of all FY26 General Fund New Year Revenues (meaning revenues received during that fiscal year), 61.8% came from local sources (see Figure 55).

FIGURE 55: GENERAL FUND NEW YEAR REVENUE FY26



Source: FY26 Jefferson County Public Schools Working Budget.

Property Taxes

JCBE has approved a four percent revenue property tax rate increase annually since FY16, the maximum allowed by law under KRS 160.470(8)(a).¹⁷³ Tax hikes beyond four percent are subject to a recall by a voter referendum.

In FY21, when the rate was raised beyond the limit to four percent plus 5.1 cents (the equivalent of an approximate 9.5% increase), a recall failed when the Kentucky Supreme Court upheld a judge’s ruling that

¹⁷¹ “Jefferson County Public Schools FY 2025-26 Working Budget Report.” Jefferson County Public Schools. Retrieved September 2025. [PDF].

¹⁷² Ibid.

¹⁷³ Ibid.

an opposition group did not gather the required signatures to go to referendum.¹⁷⁴ The Superintendent and Board Chair at the time noted the increase was long overdue and necessary for facilities improvements, raising teacher pay, and supporting struggling schools.¹⁷⁵ The vote for the increased tax rate in FY21 occurred prior to JCPS receiving over \$500M in federal pandemic relief funding (ESSER).

State Revenue

SEEK

The state revenue shown in Figure 55 is made up primarily of formula driven allocations from the SEEK funding program (13.9%). Other state funds make up 0.1% of the state revenue shown in Figure 55.

A deficiency of the SEEK formula, as noted by Finance staff, is that despite the General Assembly continuing to provide increased education funding amounts, it lags inflation. The Kentucky Center for Economic Policy reported that, “once inflation is taken into account, SEEK funding levels gained virtually no ground.”¹⁷⁶ According to the article, once adjusted for inflation, FY26 real total budgeted state SEEK funding was 24% below 2008 levels.¹⁷⁷ For FYs 27 and 28 the General Assembly increased the SEEK base per-pupil guarantee from its 2026 level of \$4,586 per-student to \$4,626 for 2027 (less than 1% increase) and \$4,792 for 2028 (3.6% increase).¹⁷⁸

Additionally, SEEK dollars go down when property assessments increase. As SEEK funding decreases for JCPS, taxpayers of Jefferson County are asked to pick up greater portions of the responsibility for funding public education.¹⁷⁹ As shown in Figure 56, SEEK funds represented only 13.9% of General Fund New Year Revenues in FY26. These state and local funding dynamics and trends are critical for JCPS leadership to understand in the context of a budget deficit and future financial planning.

¹⁷⁴ Clark, Jess. “[Ky. Supreme Court Strikes down challenge to JCPS property tax hike](https://www.lpm.org/news/2022-06-16/ky-supreme-court-strikes-down-challenge-to-jcps-property-tax-hike).” Louisville Public Media. Published June 16, 2022. Retrieved February 5, 2026. <https://www.lpm.org/news/2022-06-16/ky-supreme-court-strikes-down-challenge-to-jcps-property-tax-hike>

¹⁷⁵ Clark, Jess. “[Jefferson County School Board Passes 7-Cent Property Tax Increase](https://www.lpm.org/news/2020-05-22/jefferson-county-school-board-passes-7-cent-property-tax-increase).” Louisville Public Media. Published May 22, 2020. Retrieved February 5, 2026. <https://www.lpm.org/news/2020-05-22/jefferson-county-school-board-passes-7-cent-property-tax-increase>

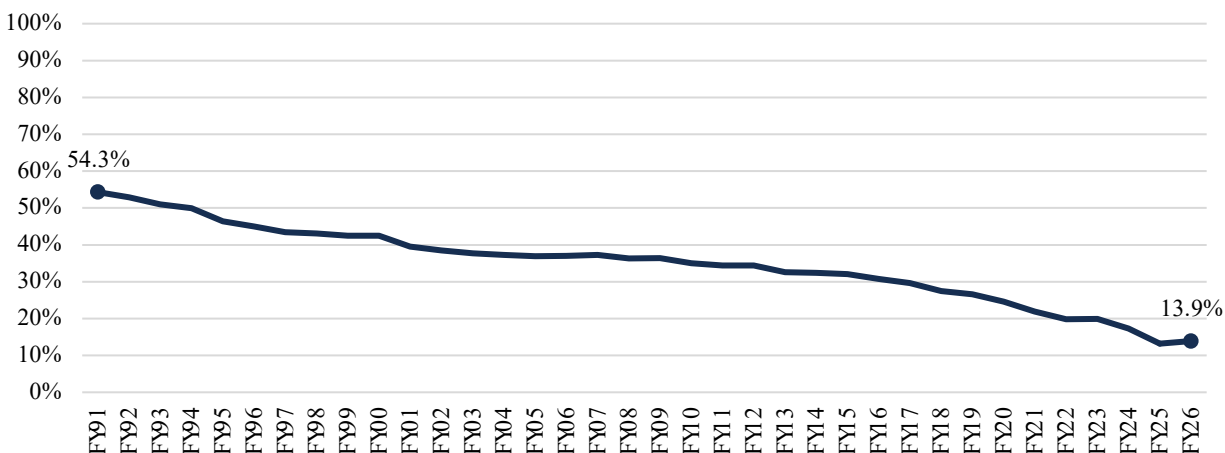
¹⁷⁶ Spalding, Ashley. “[Education Funding in Kentucky Remains Inadequate, Inequitable and Uncertain as Kids Head Back to School](https://kypolicy.org/education-funding-in-kentucky-remains-inadequate-inequitable-and-uncertain-as-kids-head-back-to-school/).” Kentucky Center for Economic Policy. Published August 13, 2025. Retrieved February 5, 2026. <https://kypolicy.org/education-funding-in-kentucky-remains-inadequate-inequitable-and-uncertain-as-kids-head-back-to-school/>

¹⁷⁷ Ibid.

¹⁷⁸ Bailey, Jason. “[Budget Agreement Cuts and Freezes Funding for Most Services, Continues to Underfund Medicaid](https://kypolicy.org/budget-agreement-cuts-and-freezes-funding-for-most-services-continues-to-underfund-medicaid/).” Kentucky Center for Economic Policy. Published April 1, 2026. Retrieved April 15, 2026. <https://kypolicy.org/budget-agreement-cuts-and-freezes-funding-for-most-services-continues-to-underfund-medicaid/>

¹⁷⁹ Jefferson County Public Schools FY 2021-22 Working Budget Report. September 2021. [PDF].

FIGURE 56: STATE SEEK FUNDS AS A PERCENT OF JEFFERSON COUNTY PUBLIC SCHOOLS GENERAL FUND NEW YEAR REVENUE



Source: Jefferson County Public Schools FY23- FY26 Working Budgets.

State-Paid Benefits

State-paid benefits are employee benefit payments made by the state on behalf of JCPS and are not available for JCPS to use. The same amount must be received and paid out in a fiscal year; in other words, they are noted in the budget in equal amounts on the revenue and expenses side.¹⁸⁰

Federal Revenue

Federal revenue is generated from permissible indirect costs associated with federal grants and makes up just 0.4% (\$6,138,388) of the FY26 General Fund New Year Revenues.

School Budgets & Resource Allocation

Allocations Summary

Schools are allocated funds based on certain factors. The school allocation standards are approved annually by the JCBE, follow 702 Kentucky Administrative Regulation (KAR) 3:246, and are described below:

- Schools are allocated operational supplies in the form of a per pupil funding amount based on a prior year Average Daily Attendance (ADA) or new-year enrollment projection, whichever is greater. In FY26, the Base SEEK was \$4,586 and the per pupil funding amount was \$160.50.¹⁸¹
- Non-Instructional Operational Resources are allocated non-instructional operating expenses, including utilities and health or safety requirements of schools as well as classroom teacher allocations that satisfy legal requirements.
- Academic Improvement Schools (AIS) receive targeted supports and resources.
- Additional resources are provided for specific instructional purposes based on student needs identified by the Board from disaggregated student achievement data.
- All schools receive Academic Instructional Coaches and every comprehensive school receives at least one Exceptional Child Education (ECE) Implementation Coach.
- Allocations for Mental Health Practitioners and District Summer Learning Programs.
- Funds for curriculum, technology hardware and supplies, furniture, and equipment.¹⁸²

¹⁸⁰ Jefferson County Public Schools FY 2025-26 Working Budget Report. September 2025. [PDF].

¹⁸¹ Jefferson County Board of Education FY 2025-26 School Allocation Standards. Version 1/18/25 for final JCBE approval. [PDF].

¹⁸² Ibid.

- Supplemental funding for all schools with enrollment of students who qualify for English as a Second Language services.
- Supplemental funding in accordance with the Board-approved student-weighted formula for all comprehensive schools.

Student-Weighted Formulas

Student-weighted formulas have been used by JCPS since the 2022-23 school year to provide additional funding to schools based on educational risk factors.¹⁸³ The JCPS Needs Index is a weighted formula of student demographics, including Free and Reduced Lunch (FRL), Mobility (students who move JCPS residence after the start-of-year headcount), ECE, and Multilingual Learners (ML). In focus groups, principals discussed the benefits of getting “add-on” funds based on the needs of their student population.

In October 2025, JCBE approved the draft FY26 school allocation standards. Students of color were removed as a component of the funding allocation model for elementary schools. A new multiplier (to be determined) would be used and based on FY27 allocated funding. The document also removed all references to “racial equity” as a goal or a component of school allocation funding.¹⁸⁴

Stakeholder Perceptions of School Budgeting

District finance and school-based staff both reported site-based budgeting to be a strength. This process allows School-Based Decision Making (SBDM) Councils to use their allocated funds to meet the individualized staffing needs of their schools. Staff described the ability for schools to “buy” and “sell” positions, based on a District average salary, for roles needed in their schools. For example, if a school determines that they require one less teacher than they were allocated by the District, they can instead use those funds to add a role that they do need, such as a Mental Health Practitioner. The SBDM has the flexibility to make these changes without Board approval. For schools that do not have an SBDM, a principal can submit the staffing change request and have an assistant superintendent sign off on the request that goes to the Finance Department.¹⁸⁵ According to principals that participated in focus groups, this flexibility and local decision-making power has allowed schools to do long-term planning and achieve improvements in their school, based on the needs of their student population. SBDM Councils are also discussed in the following chapters: **Chapter 1: District Leadership & Strategy**, **Chapter 8: Student Supports, Culture, & Climate**, and **Chapter 11: Diversity, Equity, and Poverty**.

Even with this supplemental funding, focus group participants from many stakeholder groups cited the need for additional funding to better support students.

Perceptions around resource allocation emerged as a survey theme across all respondent groups. Respondent perceptions are summarized below:

- Some respondents suggested reducing Central Office staff to allocate more resources into school-level needs.
- Respondents noted perceived disparities in funding across schools, believing some schools received more support and better facilities compared to others.
- Family and community member respondents requested more support staff, including Instructional Assistants, special education support, and equitable resource distribution for high-poverty schools.

¹⁸³ Jefferson County Board of Education FY 2025-26 School Allocation Standards. Version 1/18/25 for final JCBE approval. [PDF].

¹⁸⁴ Jefferson County Board of Education FY 2026-27 School Allocation Standards. JCBE Draft 10-2-25. [PDF].

¹⁸⁵ “[2025-26 School Year Site Based Change Form](#).” Jefferson County Public Schools Budget. 2025-26 School Year. Retrieved January 21, 2026. <https://www.jefferson.kyschools.us/page/budget>

District Strategic Investments

Findings	
4.6	The cycle-based budgeting model has not been implemented at JCPS as-designed. JCPS has not incorporated data-based evidence of outcomes, effectiveness, or return on investment into overall District budget development and investment decisions.
4.7	JCPS does not have a current strategic plan that allows for alignment of spending decisions to District priorities.

Background

A strategic approach for school districts and local government agencies to spend their funds is through priority-based budgeting.¹⁸⁶ Priority-based budgeting in a school district involves making decisions about which programs and initiatives to invest in based on how well those programs align with district values, strategies, and goals. Making determinations about whether to continue funding those programs over time usually involves an examination of the outcomes of the investment to determine if goals were met and whether investment in that program furthered the district's progress towards meeting goals. For priority-based budgeting to work effectively, a school district must have a strategic plan in place that clearly defines the district's priorities, strategies, goals, and metrics.

Since 2018, JCPS has used a cycle-based budgeting model to help determine how to spend money from the General Fund on a variety of special programs and initiatives. The model is designed to promote strategic investment and continuous improvement. The design of the model has the hallmark traits of priority-based budgeting. The system was developed to support goal-oriented budgeting with a built-in review process. In sum, JCPS wanted to see that money was spent on programs and initiatives that were the most impactful for student achievement.

Investment Tracking System (ITS)

The cycle-based budgeting model used by JCPS relies on an Investment Tracking System (ITS) built by the Assessment, Research, and Systems Improvement (ARSI) Division to support the cycle-based budgeting workflows and data associated with investments. ITS is described in the FY26 Working Budget as a "system that captures individual programs submitted with details on description, implementation plan and period, qualified goals and expected outcomes, budget detail, cost per student impacted, return on investment, and much more" and is explained as a "measuring device by which one strategy can be weighed against others in terms of impact on student achievement and provides accountability and tracking of specific projects."¹⁸⁷ According to ARSI staff, they continue to manage key aspects of the ITS process and frequently collaborate with Finance.

Analysis of 2022-23 ITS Data

The exam team reviewed metrics and goal tracking ITS data for 2022-23 program investments in Fall 2025 after the three-year cycle for those investments had concluded. Examples of the types of programs funded in the list of 2022-23 investments included, but were not limited to:

- Tutoring and mentoring programs that supported students academic and behavioral outcomes
- Trainings for students and staff
- JCPS satellite office space
- Experiential learning opportunities in arts and career pathways
- Teacher programs and support (including pipeline program and relocation reimbursement)

¹⁸⁶ Mitchell, David, et al. "[An Engaging Opportunity: The Promise of Enhanced Public Engagement for Priority-Based Budgeting](https://publicfinance.org/index.php/pfj/article/view/61)." Public Finance Journal. Volume 2. 2025. Retrieved February 2, 2026.
<https://publicfinance.org/index.php/pfj/article/view/61>

¹⁸⁷ Jefferson County Public Schools FY 2025-26 Working Budget Report. September 2025. [PDF].

Out of the 20 investments listed from 2022-23:

- Only one investment project reported accomplishing its target outcomes.
- Four investments had “partially” or “not yet” accomplished its target outcomes.
- 15 investments noted “adjust data collection,” a vague label indicating an issue with the original proposed target outcomes, metrics tracking, or both.
- The program descriptions across all investments did not specify how the investment aligned with District goals.¹⁸⁸

The detail and data from the ITS system was not publicly available and had to be requested by the exam team for review. It is unclear what information the Board receives in order to vote on investments.

Implementation of Cycle-Based Budgeting Model at JCPS

According to Finance division leaders, the cycle-based budgeting model was not implemented at JCPS with fidelity.

Alignment with District Strategy and Goals

A foundational issue with the implementation of cycle-based budgeting at JCPS is the lack of a unified District strategic plan in recent years. The District’s most recent strategic plan, Vision 2020, expired in 2020. Subsequently, the Board adopted Goals and Guardrails during the 2023-24 school year, but the District still lacks an updated, overarching plan. Attention on Goals and Guardrails have subsided, particularly since Superintendent Yearwood came to JCPS and announced his intention to start a new strategic planning process.

District goals and strategies provide a framework for aligning program investments and metrics. Without this alignment, priority-based budgeting approach of JCPS’s cycle-based budgeting model cannot function effectively. For instance, if program investments are made without reference to district goals, resources may be allocated inefficiently, undermining the effectiveness of cycle-based budgeting.

Impact of ESSER Funds on Investment Strategy

The influx of \$500M of Elementary and Secondary School Emergency Relief (ESSER) funds during the pandemic also had a significant impact on the implementation of cycle-based budgeting. Staff reported that when the District received ESSER funds, many investment decisions were made over a few years, and there was less focus on the effectiveness of those funds as programs were implemented quickly. During the pandemic, superintendents nationwide all faced this challenge of determining how to spend huge sums of one-time ESSER funds within a limited timeframe. Furthermore, federal regulation did not dictate how states and districts should report their ESSER spending, only that they provide transparency.¹⁸⁹

Finance leaders reported the dollar value of contracts for some existing investments ballooned after the infusion of ESSER funds – six-figure contracts turned into multi-million-dollar contracts, according to staff.

Gaps in Tracking Metrics and Using Data for Investment Decision-Making

Based on the analysis of the 2022-23 program data and feedback from staff, JCPS has not consistently and effectively established metrics, goals, or tracked data related to investments. Without these data practices, JCPS cannot ensure that investment decisions are aligned with District strategy and goals and cannot assess the ROI and spending impact. JCPS has not incorporated data-based evidence of outcomes, effectiveness, or return on investment into overall District budget development and investment decisions.

¹⁸⁸ “Item #17 Summary of EOC Activity.” Provided by JCPS July 31, 2025. [Excel Spreadsheet]

¹⁸⁹ Silberstein, Katherine and Roza, Marguerite. “[The Massive ESSER Experiment: Here’s what we’re learning.](https://www.educationnext.org/the-massive-esser-experiment-heres-what-were-learning/)” Education Next. April 4, 2023. Retrieved March 5, 2026. <https://www.educationnext.org/the-massive-esser-experiment-heres-what-were-learning/>

Impact of Budget Deficit on Decision-Making

Despite an influx of ESSER funds, in FY22 JCPS began spending more money than it was bringing in, running a budget deficit between revenues and expenditures.

In an article authored by JCPS Finance staff in the March 2024 publication of Kappan Magazine, an education research, policy, and practice publication, the authors describe the complex issues that districts face when they need to make budget cuts. Their analysis cites the ramifications when districts make across-the-board cuts due to budget shortfalls, and all departments cut their respective budgets by a set percentage. They reference the potential for greater inequities under this approach. The article also points out that when funds are available, districts often add new programs without an in-depth analysis of existing spending and the outcomes of that spending towards student achievement and district goals. They argue that a cycle-based budgeting model creates accountability and transparency in district spending.

Beyond broad, high-level goals, it is unclear what specific criteria have been used by the District to make decisions regarding budget cuts.

Process Changes

According to District leaders, the original implementation of the cycle-based budgeting model at JCPS followed a general process of a program director or chief creating a proposal and verbally requesting funds from the Superintendent based on needs, getting a general verbal approval, and then submitting a written formal request via ITS. This process sometimes overlapped with the contracting process in cases where a vendor or partner would be used. The investment proposals were expected to include the need, options for addressing the need, and specific resource requests such as the number of teachers, transportation required, etc. The proposal was supposed to align the needs to a budget and outline the expected outcomes from the work and how it would be measured.

As part of the original implementation, at the end of an investment's three-year cycle, ARSI planned to work with the program director to determine whether the goal was achieved or not. Some of the gaps that the exam team found with the District's oversight of vendor performance were also identified by staff and the exam team in the cycle-based budgeting process. JCPS has not built in enough guidance, rigor, and oversight into the cycle-based budgeting process. Investment proposals and outcome reporting lacked adequate data that could be used to inform funding decisions.

According to staff, lessons learned in the first few years of using cycle-based budgeting at JCPS included:

- The process lacked a rubric to determine whether a proposal for an investment was sound and could be evaluated as designed.
- The proposed metrics and data collection was not strong enough at year-end milestones as measured by annual KPIs. This made it difficult to evaluate impact at the end of the three-year cycle review.
- Staff entered planned operational expenses into ITS, such as construction of a turf field or painting a building, which ITS was not designed to track. ITS was designed to track investments in programs and initiatives.

In Fall 2025, District leaders verbally shared with the exam team their draft list of changes they planned to make to the cycle-based budgeting model, based on lessons learned in the first seven years of implementation. The development and implementation timeline for these planned changes are unknown. Those changes include:

- A new component to ITS (developed by ARSI) will categorize proposals to differentiate operations and (program) investments.
- A rubric will determine whether an investment proposal is sound and can be evaluated as designed.
- The ARSI team will support program directors and chiefs in the development of metrics, milestones, KPIs, and goals, for both interim (one-year) and full cycle (three-year) timeframes. This support will occur both at the outset of a new investment as well as during the course of review over the three-year period. ARSI's research and data expertise is meant to bring rigor to goal setting and monitoring.

The exam team commends JCPS for recognizing that the cycle-based budgeting process was not working as designed and planning improvements to bring greater accountability, transparency, and strategy to the investment decision-making process. These changes should better position the District to use prioritization — a focus on outcomes, alignment with District goals, and using data to inform decisions — in their budgeting process.

Recommendations	
4.6.a	JCPS should implement the planned changes to the cycle-based budgeting process, including an ITS system that tracks operation and investment expenditures separately, use of a proposal evaluation rubric, and ARSI support of metrics and KPI development and monitoring.
4.6.b	For investments, JCPS should identify and track metrics, milestones, KPIs, and goals as well as evidence of alignment to District-level goals and metrics. This data, along with funding source and amount, renewal status, and impact to budget should be transparent to the Board and the public.
4.6.c	As part of the budgeting process, JCPS should incorporate data-based evidence of outcomes and effectiveness, including ROI, to make investment decisions.
4.7.a	JCPS should develop budgeting priorities in alignment with an established District strategic plan.

Budget Deficit

Background

The goal of the **Budget Deficit** section of this report is to explain the state of the JCPS budget deficit in recent years, and the contributing factors that led to it.

The exam team reviewed financial summary data and reports from FY22-26, which captured the special exam focus period of July 1, 2022 – June 30, 2025 as well as the fiscal years directly preceding (FY22) and following that time period (FY26) to the end of fieldwork. These years also represented the timeframe that financial reports and data were available through public resources. The exam team did not conduct a forensic financial exam of JCPS; rather, the review focused on behaviors, actions, policies, and processes. The recommendations in this section are primarily focused on improvement to structures and procedures to improve communication, transparency, knowledge, and decision-making. The report intentionally does not include analysis or recommendations related to proposed budget cuts, as that is beyond the scope of this review and is under the purview of JCBE and JCPS administration to make those determinations.

Summary

JCPS has been in a budget deficit since FY22. District planned expenditures have exceeded New Year Revenues in every formal iteration of the budget developed by JCPS administration and approved by the Board between FY22-26. JCPS was able to pay for excess spending over the last few years by using their Fund Balance to cover expenses. This practice has led to a depleting cash flow and a need to make drastic cuts to spending in order to get on a path towards a balanced budget — in which the New Year Revenues equals the New Year Expenses while maintaining a minimum Contingency balance, as required by law.

JCPS's financial situation resulted from several factors listed below and discussed in more detail in the sections that follow:

- **The District planned to spend more money than it was bringing in:**
 - In their Board-approved budgets, the District intentionally planned to spend more money (expenditures) than they brought in (revenues) every year between FY22-26.
- **The District used their Fund Balance to cover excess spending:**
 - Property tax increases and an influx of \$500M in ESSER funds contributed to a larger-than-normal cash flow, giving JCPS a high Fund Balance.

- The District lacked a plan for how unassigned funds should be used.
- The District used the Fund Balance to cover the excess spending, an unsustainable practice that has led to depleting cash flow and projected inability to cover payroll and basic operating expenses.
- **Issues with engagement, communication, transparency, and understanding of school district financial management occurred with the JCPS Superintendent and the Board.**
- **District policies and procedures lack clarity regarding roles and responsibilities and decision-making authority as it relates to budgeting and fiscal controls.**

Cash Flow in the General Fund

Finding	
4.8	Contingency, required by state law to maintain a balance of 2% of the District's total budget, is projected to drop to a negative balance by FY28 unless major cuts are made to the FY27 and FY28 budgets.

Observation	
4.9	JCPS has relied on the Fund Balance to cover expenditures that exceed revenues.

Understanding the District's cash flow needs and requirements is a key aspect of understanding the broader picture of the District's budget and deficit. The General Fund includes funds that do not come from recurrent, annual New Year Revenues. See Figure 57 for a description of Fund Balance terms.

FIGURE 57: FUND BALANCE DESCRIPTIONS

TERM	Description
Beginning Fund Balance	The July 1 st beginning-of-year snapshot of the District's General Fund cash-on-hand for managing payroll and expenses. Equal to the end-of-year Fund Balance for the prior year. Includes Carry Forward and Carryover.
Carry Forward	Any unpaid liabilities from the previous fiscal year allocated in the new fiscal year. Also known as "encumbered" funds reserved for a planned expense that has not yet been paid.
Carryover	Unused funds that will be re-allocated in the new year.
Fund Balance	At any point in the year, represents the difference between Contingency and any debits or credits incurred against the Contingency during the fiscal year.
Contingency	Contingency equals the difference between the Beginning Fund Balance and the difference between the revenue and expenses for the new year. KRS 160.470(6)(a) requires a minimum 2% cash reserve of the total budget; Kentucky Department of Education (KDE) recommends a minimum 5% reserve. ¹⁹⁰

Source: Jefferson County Public Schools FY26 Working Budget.

¹⁹⁰ Jefferson County Public Schools FY 2025-26 Working Budget Report. September 2025. [PDF].

Carry Forward and Carryover

In exam interviews, JCPS Finance staff noted that property tax increases and the \$500M one-time ESSER funds contributed to a large Fund Balance during the FY22-26 time period. That Fund Balance was used to cover the deficit of revenues to expenses since FY22.

As outlined above, Carry Forward and Carryover are components of the Fund Balance.

- Carry Forward represents bills the District expects to pay in the new fiscal year — often from projects that span multiple years and from POs that have not yet been paid. The District knows it must plan for those bills and have enough cash-on-hand to cover them, so those funds are encumbered (designated and set aside) to pay those bills.
- Carryover represents allocations leftover from the previous fiscal year that were not spent and can be carried over into the new fiscal year and re-allocated.

In its January 20, 2026 presentation on its review of JCPS's financial forecasting model, consulting firm Alvarez & Marsal representatives noted it was unusual to see such high Carry Forward and Carryover amounts. Based on their work with other school districts, they noted that typically school districts try to spend down their funds by the end of the fiscal year.

According to the CFO, the District's Carry Forward amount has been very high since the end of the pandemic and ESSER funds. JCPS used ESSER funds to pay for long-term projects out of the General Fund. Since some of those projects spanned multiple years, the funds were carried forward each fiscal year as encumbered funds designated for those projects until the projects were completed and all bills paid.

The exam team's analysis did not include a detailed review of Carryover funds, making it unclear if and why JCPS may have had high Carryover in recent years. In JCPS's FY26 Working Budget, Carryover is described as the unused balance in the schools' General Fund flexible accounts that is provided back to the schools in the subsequent year."¹⁹¹ The budget report notes that Carryover funds provide "schools the opportunity to plan for specific needs and removes the 'use it or lose it' mentality that may lead to financial inefficiencies."¹⁹²

JCPS guidance for SBDMs on allowable Carryover funds states that only allocations in projects 900XF and 900XS can "carryover" into the new year.¹⁹³ Those MUNIS project codes represent flexible payroll (not full-time salaries) and operational codes. The guidance also notes that schools may not use Carryover funds to "buy" a position and unused salary budgets will not carryover into the new year.¹⁹⁴ Future analysis may be required to better understand the District's practices with Carryover funds and whether schools are effectively and fully investing available resources for current students.

Both Carry Forward and Carryover Funds have been allocated by the time of the September Working Budget. Since expenses paid exceed revenues collected from July until September, the Fund balance decreases. Figure 58 shows the Fund Balance at the time of the July 1st beginning of fiscal year and September Working Budget for FY22-26.

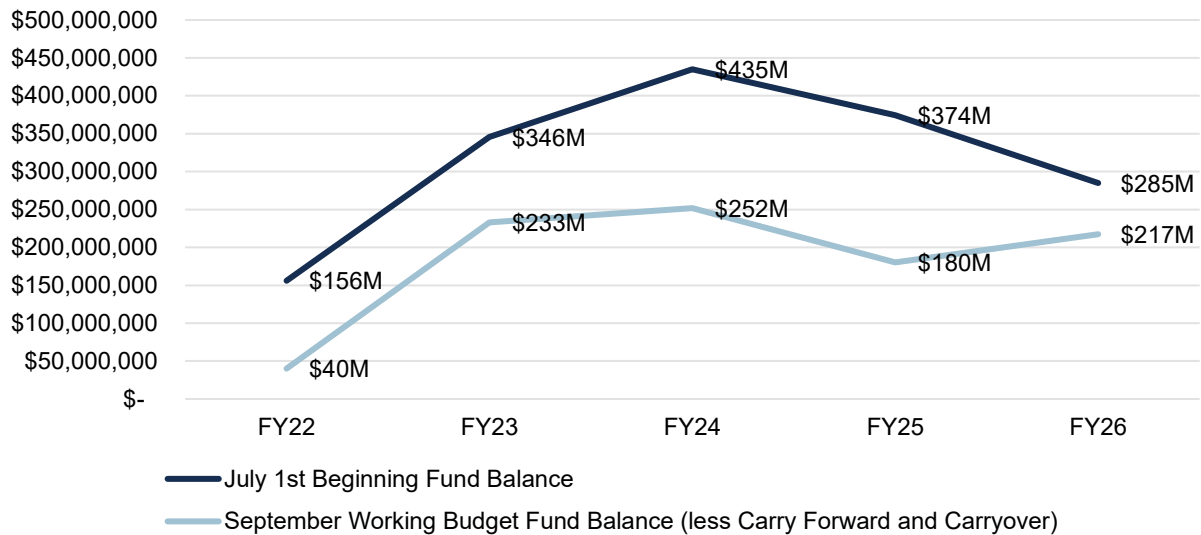
¹⁹¹ Jefferson County Public Schools FY 2025-26 Working Budget Report. September 2025. [PDF].

¹⁹² Ibid.

¹⁹³ "[22-23 Frequently Asked Questions](https://budget.jefferson.kyschools.us/2223_Website_Info/22-23%20FREQUENTLY%20ASKED%20QUESTIONS%2001-31-22.pdf)". Jefferson County Public Schools. Published January 31, 2022. Retrieved February 9, 2026. https://budget.jefferson.kyschools.us/2223_Website_Info/22-23%20FREQUENTLY%20ASKED%20QUESTIONS%2001-31-22.pdf

¹⁹⁴ Ibid.

FIGURE 58: JULY & SEPTEMBER FUND BALANCE FY22-26

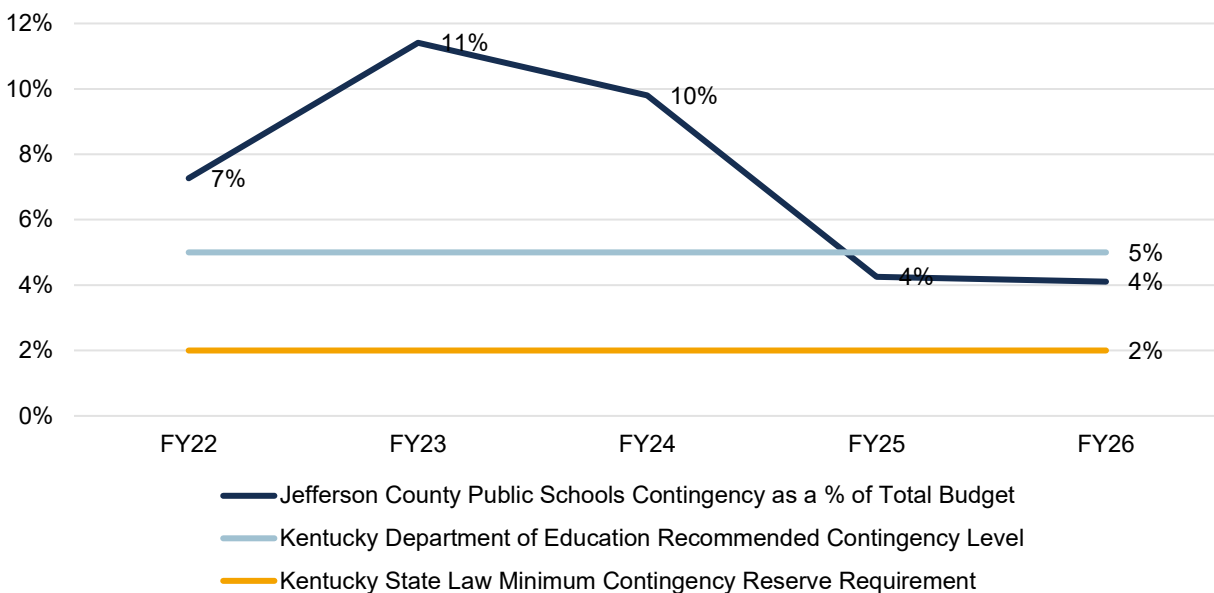


Source: Jefferson County Public Schools FY22-26 Working Budgets.

Contingency

State law requires districts maintain a minimum contingency balance available at any point in time during the budget cycle. Figure 59 shows that JCPS has dropped below the KDE-recommended levels over the last two fiscal years but has maintained the minimum level required by state law.

FIGURE 59: CONTINGENCY LEVELS FY22-26



Source: Jefferson County Public Schools FY22-26 Working Budgets.

Note: Total Budget represents General Fund revenue (New Year Revenue & State-Paid Benefits) plus Fund Balance.

Revenue Collection Timeline & Importance of Fund Balance

Since Jefferson County property tax deadlines are in November and December, the majority of the District's revenue is collected during that time period. According to Finance staff, in FY24 and FY25, 56% of all JCPS New Year Revenues were collected during the months of November and December. While the District collects some revenue during the other nine months of the year, JCPS operates at a net loss every month

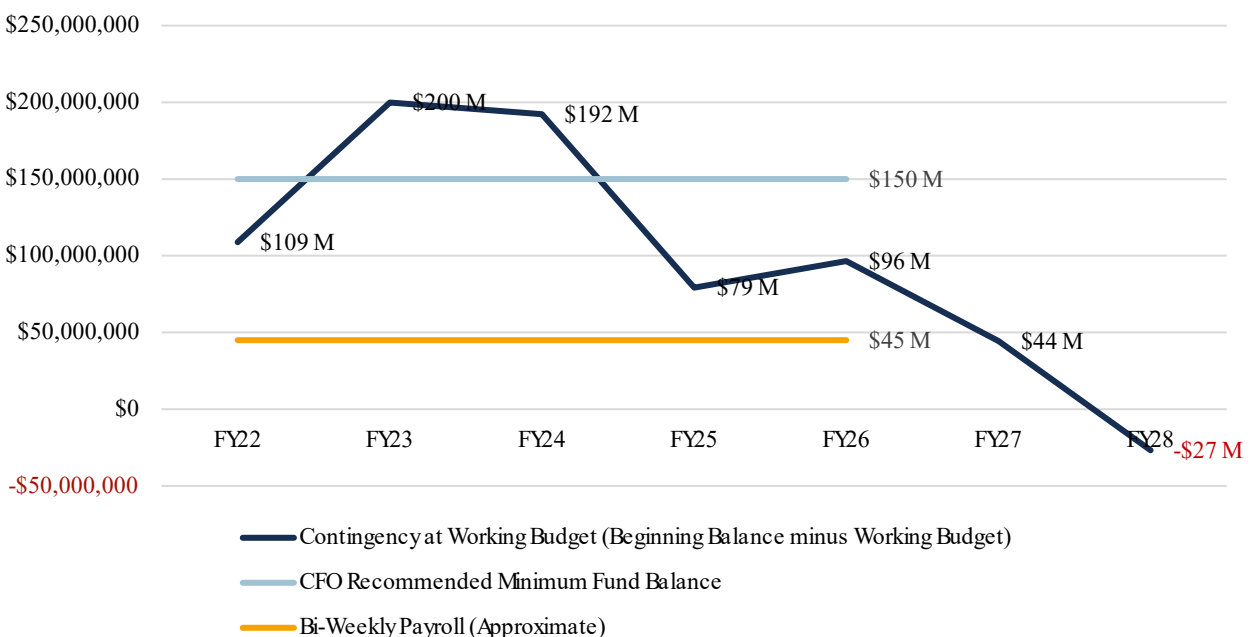
during the year except for November, December, and January.¹⁹⁵ There is a very slim margin for JCPS to be able to make payroll, particularly in the July through October timeframe, prior to the next major infusion of New Year Revenues.

The JCPS Finance department estimates that a July 1st beginning of fiscal year unassigned Fund Balance minimum of \$150M is necessary to maintain the cash flow needed to make an approximate \$45M bi-weekly payroll from July through October each year.¹⁹⁶ The revenue swings and cash flow needs is something the District anticipates and plans for annually. According to Finance staff, getting through the lean revenue months is feasible so long as there is adequate Fund Balance to cover expenses.

Finance staff noted that under Superintendent Pollio, a “budget plan” did not exist for use of unassigned funds beyond the state-required minimum contingency. According to Finance staff and published Working Budgets, this lack of a budget plan led to a practice of using the unassigned funds in the Fund Balance to cover recurring and one-time expenses that exceeded revenues, depleting their necessary reserves and leading the District into a structural deficit.

According to data projections calculated by Finance staff (see Figure 59 and Figure 60) and, at the time of the FY26 Working Budget, the Contingency balance was projected to drop below the thresholds required by the state and recommended by KDE — and below a value equal to bi-weekly payroll — to a negative balance by FY28 unless major cuts are made to the budgets for FY27 and FY28.

FIGURE 60: JCPS CONTINGENCY LEVELS FY22-26



Source: Jefferson County Public Schools FY22-26 Working Budgets & Finance Division.

Recommendations	
4.8.a	JCPS should bring contingency levels back to the minimum KDE-recommended levels of 5% of the total budget.
4.9.a	JPCS should adopt a Fund Balance policy that establishes minimum thresholds to meet contingency requirements and cash flow needs, particularly during lean revenue months. The policy should include criteria for use of unassigned funds in the Fund Balance.

¹⁹⁵ Jefferson County Public Schools FY 2022-23 Working Budget Report. September 2022. [PDF].

¹⁹⁶ Ibid.

4.9.b

JCPS should examine the reason(s) for high Carryover and Carry Forward funds in the past, its impact on the Fund Balance and budget overall, and identify opportunities to more strategically spend these funds given its current financial situation.

Budget Deficit Over Time

Finding

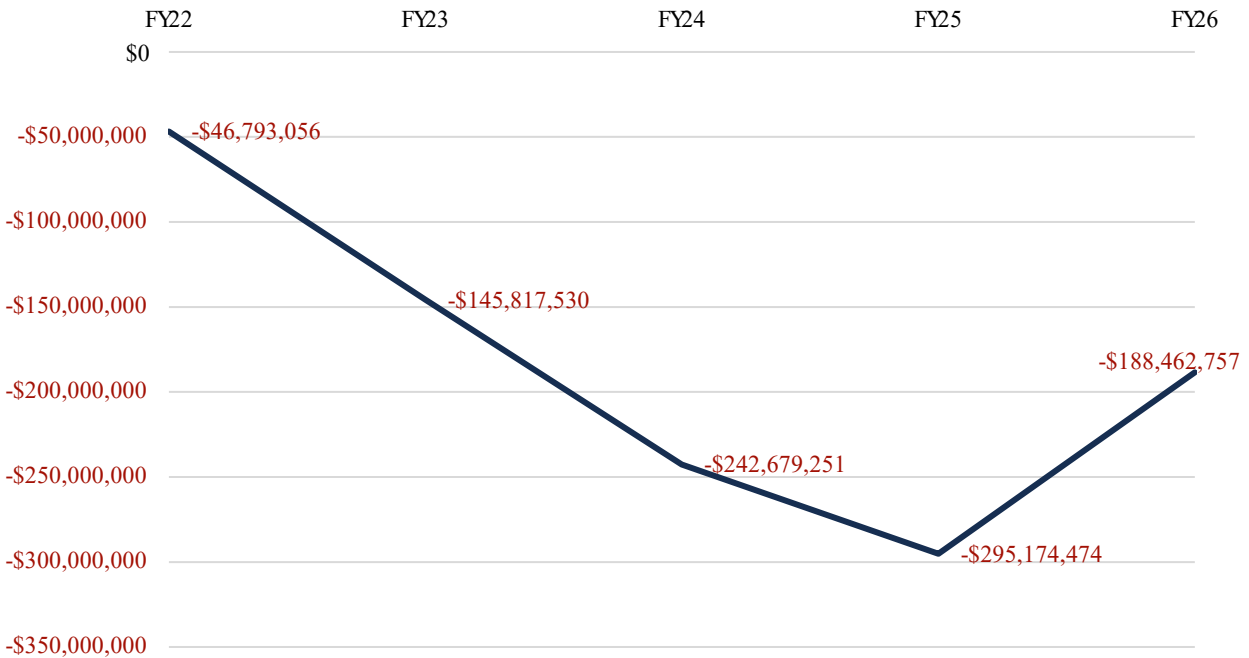
4.10

JCPS expenditures exceeded revenues during the examination period of FY22-26, with a budget deficit that reached \$295M in FY25.

The budget deficit represents the difference between New Year Revenues and New Year Expenses as reported at the time of the September Working Budget each fiscal year.

As shown in Figure 61, JCPS carried a budget deficit of nearly \$47M in FY22. That deficit increased to \$295M in FY25. As of the FY26 Working Budget, the deficit was projected to drop to \$188M in FY26.

FIGURE 61: BUDGET DEFICIT OVER TIME



Source: Jefferson County Public Schools Finance Division and FY22-26 Working Budget Reports.

Note: Deficit reflects the difference in (New Year) Revenues and expenses at the time of the Working Budget and includes Carry Forward and Carryover to the Beginning Fund Balance. Contingency is not included.

Figure 62 represents the (January) Draft, (May) Tentative, and (September) Working Budgets between September 2022 and September 2025. Each version of the budget (Draft, Tentative, Working) was presented to the Board, approved by the Board, submitted to KDE, and posted publicly online. Expenses were greater than revenues in every iteration of the budget during this FY22-26 time period.

FIGURE 62: DIFFERENCE IN REVENUES AND EXPENSES AT TIME OF EACH BUDGET REPORT FY22-26

YEAR/VERSION	Total Budget	Revenues	Expenses	Difference
FY22 Working	\$1,498,313,428	\$1,342,313,428	\$1,389,106,484	-\$46,793,056
FY23 Draft	\$1,541,588,509	\$1,361,044,509	\$1,390,727,092	-\$29,682,583
FY23 Tentative	\$1,567,126,491	\$1,361,864,491	\$1,416,265,074	-\$54,400,583
FY23 Working	\$1,751,960,199	\$1,406,260,199	\$1,552,077,729	-\$145,817,530
FY24 Draft	\$1,732,415,580	\$1,441,785,750	\$1,514,716,746	-\$72,930,996
FY24 Tentative	\$1,711,606,654	\$1,431,531,256	\$1,517,892,503	-\$86,361,247
FY24 Working	\$1,962,098,247	\$1,527,137,037	\$1,769,816,288	-\$242,679,251
FY25 Draft	\$1,532,773,550	\$1,433,547,164	\$1,532,773,550	-\$99,226,386
FY25 Tentative	\$1,744,360,855	\$1,464,285,457	\$1,530,113,634	-\$65,828,177
FY25 Working	\$1,864,482,371	\$1,490,019,425	\$1,785,193,899	-\$295,174,474
FY26 Draft	\$1,952,876,585	\$1,549,083,089	\$1,640,872,721	-\$91,789,632
FY26 Tentative	\$1,923,151,695	\$1,548,447,223	\$1,650,757,145	-\$102,309,922
FY26 Working	\$2,350,845,634	\$1,609,751,118	\$1,798,213,875	-\$188,462,757

Source: Jefferson County Public Schools Finance Division.

Note: In the Working Budgets (shaded rows), Total Budget column represents General Fund New Year Revenues, State-Paid Benefits, and Fund Balance. Revenues column represents General Fund New Year Revenues and State-Paid Benefits. Expenses column represents expenses and Fund Balance (inclusive of Carry Forward, Carryover, and Fund Transfer, but excluding Contingency). The Difference value for the Draft and Tentative Budget (white rows) does not include Fund Balance and Contingency in order to reflect the recurrent difference between revenues and expenses. Since Fund Balance and Contingency are known by the (September) Working Budget, it is included along with any new expense increases since the time of the (May) Tentative Budget.

According to District Finance staff, JCPS cut approximately \$100M from FY25 to FY26 through the conclusion of one-time expenses and long-term projects, delaying funding needs until later, and moving funds out of the General Fund into the Jefferson County Public Education Foundation (JCPEF). The majority of the \$100M in budget reductions were not true cuts, according to District Finance staff. In fact, the FY26 Working Budget included new recurrent increases, such as a 3% Cost of Living Adjustment (COLA) salary increase, equating to approximately \$30M.

Recommendation	
4.10.a	JCPS should develop and present balanced budgets to the Board in which expenditures do not exceed revenues.

Major Expenditures

Figure 63 outlines several major expenditure categories that impacted the deficit, which included both recurrent and one-time expenses:

FIGURE 63: MAJOR EXPENDITURES CONTRIBUTING TO THE DEFICIT

RECURRENT EXPENSES	Description	Cost
Cost of Living Adjustment (COLA)	Negotiated annually for staff salaries. Equates to \$10M in actual recurrent expenses for every 1% COLA pay raise. COLAs represent the largest recurrent expenditure category.	\$140M (FY23-26)
Elementary and Secondary School Emergency Relief Fund (ESSER)	Federal pandemic relief funding. JCPS received and spent \$507M of ESSER funds between FY22-25. In FY24, over \$51M of recurrent ESSER expenses were moved into the General Fund to sustain continued funding of select initiatives, including: • Staffing costs • Bus driver incentive pay • Summer programming • Academics curriculum	\$51M (FY24-26)
School Racial Equity Funds	Based on a weighted formula using student demographics, schools receive differentiated levels of funding to support the school's Racial Equity Plan to reduce disproportionality.	\$35M (FY24-26)
AIS and Choice Zone	Stipends and Professional Development Days.	\$20M (FY24-26)
Central office organizational chart changes	Changes to Central Office job positions and salary grades.	\$15M (FY23-25)
ONE-TIME EXPENSES	Description	Cost
One-time expenses	Represents one-time expenses for projects, some which spanned multiple years.	\$61M Annual Facilities and Improvement Funds (FY22-26) \$31M Audio Enhancement (FY23-26) \$21M Athletic fields (FY23-25) \$7M Weapons Detections Systems installation, equipment and services (FY24) \$3M Playgrounds (FY23-26)

Source: Jefferson County Public Schools FY26 Tentative Budget.

Note: Figure represents a summary of major expenses. Not all expenses during FY22-26 time period are noted.

Despite frequent JCPS administration and media references to the management of ESSER funds as a primary factor contributing to the District's budget deficit, the expenditure data show a broader view. As previously mentioned, JCPS had a huge influx of ESSER funds, which increased its Fund Balance as it

worked to spend the federal grant funds. That high Fund Balance was used to help cover expenses that exceeded revenues. As the CFO noted in the September 16, 2025 Board meeting, “This District [budget] was out of whack and then ESSER happened. ESSER gave [the District] the cash flows that allowed us to become more and more undisciplined.” In FY24, the Board voted to keep \$51M worth of positions and initiatives—originally funded by one-time ESSER funds—as a recurrent expense to the General Fund.

This investment was substantial; however, COLA salary increases amounting to \$140M between FY23-26 represent the largest recurrent expenditure category contributing to the deficit. Central Office changes to job positions and salary grades was a major recurring expense, as well. During discussion with Board members at the September 2025 Board meeting, the CFO noted that approximately 87% of the General Fund is comprised of salaries and fringe benefits for District staff and is notably much higher than other districts which are closer to the 75-80% range. Special projects and other non-personnel costs were also factors. The January 20, 2026 Board meeting presentation from Alvarez-Marsal also showed that non-personnel, in aggregate, has increased by an average of \$22.5M per year since FY23.

Minor Expenditures

The exam team reviewed a sample of POs from FY23-25. JCPS processed 47,312 POs in FY23, 45,052 in FY24, and 41,990 in FY25. Contrary to KDE guidance, the exam team found that JCPS had not ensured close out of all POs by the end of the relevant fiscal year. There was also an instance of an invoice that was not paid on time. These process issues, while seemingly minor, are especially relevant in the current context of the District’s budget deficit and focus on cuts to spending. The review of PO data showed a wide range of expenditure categories and amounts. JCPS maintains a publicly accessible “Open Finance” site online that provides financial transparency and access to the District’s revenue, expenditures, and budgets for the current fiscal year, as well as past years.¹⁹⁷ What cannot be gleaned from PO and expenditure data alone is the context around the necessity or justification of the purchase. As described in preceding sections in this chapter, District divisions and departments have budgets overseen by their Chiefs and senior leaders, and schools are allocated budgets overseen by principals and SBDMs. Although the major expenditures cited above in Figure 63 are examples of some of the most impactful recurring and one-time expenses that have contributed to the District’s deficit, minor expenditures at the department and school level are also worthy of examination for cost-saving opportunities. A complete summary of FY25 PO expenditure data by account description is included in **APPENDIX C: FY25 Purchase Order Expenditures**.

Fiscal Year 2025-26 Budget Cycle Timeline

According to records and staff interviews, over the last few years, risks and concerns related to the budget were discussed in Board meetings, Board committee meetings, individual meetings with Board members, and cabinet-level meetings between District administrators. However, it was during the FY26 budget cycle that the Superintendency changed and the budget deficit issue came to a head and drew significant attention from the Board and the JCPS community.

The exam team reviewed all FY26 public Board meetings, minutes, and budget related agenda items during this time to understand how information was prepared, presented, and discussed throughout the budget cycle. The exam team also interviewed District leaders and staff, Board members, and ARMAC leadership to understand their perceptions and experiences during this timeframe.

Figure 64 is a sequential summary of meetings and activities related to the budget that occurred in 2025:

¹⁹⁷ “[JCPS Open Finance](https://jcps.finance.socrata.com/#!/dashboard).” Board of Education of Jefferson County, KY. Retrieved May 29, 2026. <https://jcps.finance.socrata.com/#!/dashboard>

FIGURE 64: FISCAL YEAR 2025-26 JEFFERSON COUNTY BOARD OF EDUCATION MEETINGS AND ACTIVITIES RELATED TO THE BUDGET

MEETING	Activities Related to the Budget
January 28, 2025 Regular Business Meeting of the Board	• 45-minute presentation, discussion, and approval of the FY2025-26 Draft Budget. • Review of the 2025-26 School Enrollment Projections and the School Allocation Standards which exceeded the minimum requirements of 702 KAR 3:246. • The Board reviewed a presentation including a breakdown of aggregate totals for federal, state, and local revenue sources which were less than the District's projected expenditures resulting in a projected \$91.8 million net loss for FY26.
February 5, 2025, ARMAC Meeting	• Three committee members, ten District staff, and no Board members were present. • One of four agenda items during the 115 minutes pertained to the District's finances as a follow-up to the January 28, 2025, Board Meeting. • The committee's discussion of the \$100 million deficit yielded the following action steps: (1) continue monitoring the budget impact of federal and state policy changes; (2) develop a contingency plan for anticipated funding reductions; and (3) align vacancy management strategies with instructional priorities.
February 28, 2025 Meeting between Finance and Internal Audit	• Finance staff presented on the budget shortfall to Internal Audit. • While the budget shortfall was not new information to Internal Audit, the tone of the messaging had shifted to the situation being critical and the need to take immediate action. • Internal Audit was able to study the forecasting data for the first time and understood that in the near future, the District would not be able to pay its bills.
April 1, 2025 Internal Audit issues memo on budget risk	• After meeting with the CFO and Executive Administrator for Budget, the Internal Audit Director formally documented the FY26 budget risk, communication, and internal control considerations in a memo back to those staff to memorialize the conversation and to escalate the issue. • The memo indicated the budget was the highest risk item for all of JCPS and was at a risk-level that action must be taken.¹⁹⁸ The memo included specific recommendations for next steps, including the potential for further escalation in accordance with Internal Audit's governance reporting responsibilities, pending progress updates made in response to concerns.¹⁹⁹ The memo was intended for internal leadership audiences. Members of ARMAC and the Board also received the memo.

¹⁹⁸ Porter, May. Internal Audit Director. "FY2026 Budget risk, communication, and internal control considerations." JCPS Internal Audit Memorandum to Edward D. Muns, Chief Financial Officer and Dr. Thomas Aberli, Budget Executive Administrator. April 1, 2025. [PDF].

¹⁹⁹ Ibid.

April 16, 2025, ARMAC meeting	• In April 2025, the CFO requested and was granted permission by the Superintendent to present to ARMAC to help the Board understand how critical the budget situation was. • The minutes from April 16, 2025, ARMAC meeting identified four committee members, eight District staff, and no Board members were present. • The second of three agenda items during the 115 minutes focused on Tentative Budget update in advance of the Board's scheduled meeting on May 13, 2025, and the state's required submission date of May 31, 2025. JCPS Administration explained the potential for a "liquidity crisis" impacting the ability to make payroll if the identified annual deficits were not addressed in the next three fiscal years totaling over \$160 million at the aggregate. The following highlights were noted: ○ JCPS must cut \$100M in FY26, \$50M in FY27, and \$10M in FY28. ○ Maintaining a 5% contingency balance is critical; without cuts, the District risks falling below even the 2% minimum. ○ Programs originally funded externally are now tapping into local funds or the JCPEF MacKenzie Scott funds. ○ Future revenue is uncertain; strict discipline is essential even after this year's cuts. ○ ARMAC is asked to help with shaping messaging to the Board to emphasize the urgency and necessity of immediate action.
Stakeholder interview feedback regarding the April 2025 ARMAC meeting and what followed: • According to multiple staff and individuals present, the budget situation was described by the Superintendent as a "declining fund balance" and the committee did not have a noticeable reaction. • When Internal Audit reached out to ARMAC to help support the committee in their messaging to the Board about the critical budget situation and need to make immediate cuts, Internal Audit received no response.	
May 13, 2025 Regular Business Meeting of the Board	• 45-minute presentation, discussion, and approval of the FY2025-26 Tentative Budget. • The Superintendent and CFO presented. • The presentation included considerations and action steps for the Board and District to address the \$100 million deficit reduction in FY2025-26 and an additional forecasted \$50 million deficit reduction in FY27. • The Board asked clarifying questions regarding the cause of the deficit, the current solvency of the District, and the options to take actions that would address the deficit in the District's future budget. • JCPS administration noted that while the District actions on spending had been "prudent," additional cuts to equalize any line items added

	back into the budget would be required to avoid getting closer to the 2% minimum threshold for the District's contingency balance. Stakeholder interview feedback regarding the May 2025 Board meeting and what followed: • Multiple District leaders interviewed felt that the Superintendent mischaracterized the situation and that the Board was not fully informed on the critical nature of the budget situation. • According to stakeholder interviews, Internal Audit believed that corrective action was required and requested that the Superintendent clarify "misstatements." That request was denied, according to staff. • Following the May 2025 Board of Education meeting, select Board members met individually with the Superintendent and CFO regarding the budget. According to participants present for those meetings and based on the content of the slides presented, the questions from Board members and discussion was primarily focused on funding for particular programs and initiatives of interest to Board members, rather than an emphasis on the forecasted budget shortfalls and related implications. The Superintendent managed the messaging of these meetings and the tone was reportedly positive. Following those meetings, Internal Audit consulted separately with the Chief of Staff and the Chair of ARMAC regarding options for next steps on escalation. A collaborative determination was reached, with the agreement of all parties, that awaiting the transition to the incoming Superintendent was the appropriate course of action at that time.
July 1, 2025 New Fiscal Year Begins & New Superintendent Begins	• Dr. Brian Yearwood assumed the Superintendency. • He spent two hours on his first day in the role meeting with the CFO and the Budget Director regarding the budget deficit. Superintendent Yearwood was briefed on the need to make additional cuts beyond what was previously messaged—\$188M over two years instead of \$150M.
August 13, 2025 ARMAC meeting	• Five committee members, five District staff, and two Board members were present. • One of three agenda items included a financial services update from the District's CFO. The update included a discussion of the external financial audit, messaging related to the FY26 budget deficit, and the District's goals to address the deficit by avoiding across-the-board reductions that could impact classrooms. This section noted that once a budget reduction package was developed, that JCPS Finance would have one-on-one meetings with Board members to review. • During a separate agenda item during this meeting, Internal Audit noted budget development and financial sustainability were one of the District's highest-rated risks based on staff feedback from the annual internal risk assessment.
August 19, 2025 Regular Business Meeting of the Board	• 13-minute Annual Tax Rate Hearing presentation and the unanimous approval of the SY2025-26 tax rate at 4% based on the District's recommendation. There was no discussion.

September 16, 2025 Regular Work Session of the Board	65-minute presentation, discussion, and unanimous approval of the FY2025-26 Working Budget. - JCPS administration expressed urgency to the Board to address the FY2025-26 budget deficit of \$188 million, and to address the District's potential of financial insolvency as soon as October 2027. - This was the first time that District staff used the term "insolvency" to describe the potential future state of the District if cuts were not made. - The Board Chair questioned District administration as to whether the District had deceptively communicated prior to presenting the Working Budget. While the District denied being intentionally deceptive, they conceded that some of the tone and content of the September Working Budget presentation was different from presentations of Draft and Tentative Budgets earlier in 2025. - Board members asked clarifying questions regarding the accuracy of the District's budget forecasting model and possible action steps to address the budget deficit including additional guardrails to avoid multiple years operating on a deficit budget.
January 20, 2026	FY27 Draft Budget Approval

Source: Data provided by Jefferson County Board of Education.

Note: ARMAC and Board meeting details were derived from posted draft and final meeting minutes, as well as recorded video. Details from other meetings and actions came from data collected in interviews.

The data presented above highlights issues with communication, knowledge, authority, processes, and transparency. Factors that contributed to these issues are discussed below.

Superintendent Role

Understanding and Communicating the Budget

Superintendent Pollio was recognized by stakeholders as a visionary with big ideas for the future in pursuit of student achievement and JCPS success. Staff describe the Superintendent's communication style as "non-confrontational" with "hyper-positive" messaging and tone that, when used in budget related meetings and presentations, may not have conveyed the severity of the budget situation to his audiences. According to Superintendent Pollio in his interview for this exam, he strongly believed that JCPS was long overdue for major capital improvements, resourcing high poverty (Choice Zone) schools, and addressing staffing vacancies districtwide. When it came to planning for necessary budget cuts, stakeholders interviewed perceived that a "kick the can down the road" approach was taken. In meetings and in his exam interview, Superintendent Pollio frequently acknowledged that future hard decisions would have to be made regarding the budget. Those decisions largely fell to Superintendent Yearwood when he assumed the role at the beginning of FY26.

According to stakeholders, during his tenure, Superintendent Pollio was the primary messenger to the Board on budget-related matters. Presentations, information, and messaging that came from the CFO or other District staff, were reviewed and edited in accordance with the Superintendent's preferred tone, messaging, and approved content.

According to Finance staff, Superintendent Pollio also had final editorial decision-making on the budget reports prior to their submission to the Board. Superintendent-directed revision examples cited by Finance staff included:

- Changing expense narratives to minimize deficits by categorizing several large investments as one-time expenses that were actually recurring expenses representing positions, curriculum, and contract services.

- Inserting projected vacancy credits and one-time expenses into Working Budgets to minimize the growing deficit between recurrent revenues and expenses. Finance staff noted this occurred upon direction from the Superintendent in FY23, resulting in the presentation of a Working Budget that masked that the recurrent deficit had grown to nearly \$146M.
- Removing references to the several years of increases to Central Office costs (and disaggregation of cost increases by division) that represented differences in allocations for new positions, upgrades to existing positions, and old positions traded in for new. An example of this, according to Finance staff, was the removal of a table in the FY26 Tentative Budget that showed a breakdown of total cost increases to Central Office positions by division over the last two years. While some staff interviewed felt that the Superintendent had been intentionally deceptive to the Board when he discussed the budget and expenditures, others described him as a leader who did not have the fiscal expertise to fully understand the nature and severity of the budget deficit. According to Finance staff, in Superintendent Pollio's communication to the Board, funds to cover expenses added after the Draft and Tentative Budgets had already been approved were sometimes described as coming from a "slush fund" or "surplus," which staff describe as a misrepresentation of the District's Fund Balance.

Finance staff who were present in meetings between the CFO and Superintendent Pollio noted that financial commitments were made by Superintendent Pollio without the involvement of the CFO or against the advice of the CFO. This pattern of behavior was observed throughout his tenure and across multiple CFOs.

Fiscal Controls and Transparency

Findings	
4.11	The Board policy on budget control responsibility lacks specificity in roles and responsibilities and decision-making authority.
4.12	JCPS does not have established procedures and controls related to budget roles and responsibilities and decision-making authority.
4.13	Financial commitments were made after funding was allocated in the Draft and Tentative Budgets, resulting in added expenses within the new year Working Budget.
4.14	JCPS Finance staff faced barriers to direct communication with the Board regarding changes to the budget.

JCBE Policies

JCBE has several policies specifically related to fiscal management that are relevant to some of the gaps and issues found related to the JCPS budget:

FIGURE 65: JEFFERSON COUNTY BOARD OF EDUCATION FISCAL MANAGEMENT POLICIES

POLICY	Description
JCBE Policy 04.1 Fiscal Management: Budget Planning and Adoption – Budget Control Responsibility	Budgeted funds will be expended to meet the Board’s goals and objectives. Appropriate and adequate budget controls shall be devised and implemented, and deviations promptly reported, together with plans for correction, to the appropriate cost center head. Responsibility for control of the annual budget shall be delegated to the appropriate cabinet member and school principals with additional responsibility for controlling the total budget to the Chief Financial Officer. ²⁰⁰
JCBE Policy 04.31 Fiscal Management: Fiscal Accounting and Authority to Encumber/Expend Funds – Expenditure of Funds	Expenditures from any District fund shall be made in accordance with the budgets approved by the Board. All purchases shall require the prior approval of the Superintendent or the Superintendent’s designee. ²⁰¹

Source: Jefferson County Board of Education.

Policy 04.31 states that all expenditures must be made in accordance with the budgets approved by the Board. According to Finance Division staff, the “appropriate and adequate budget controls” referenced in Policy 04.1 had never been developed nor implemented, and “deviations” had not been defined. Typically, standard operating procedures are developed to outline the processes and practices required to adhere to policies. JCPS does not have established procedures and controls related to budget roles and responsibilities and decision-making authority. The lack of procedures detailing decision-making and communication regarding expenditure requests that were not accounted for in the approved budget is problematic for JCPS.

Lack of Transparency in Financial Commitments

This lack of clarity resulted in an environment where new financial commitments were often made by Superintendent Pollio without the involvement of the CFO, according to multiple staff. Staff described a pattern of financial commitments and funding approvals made by Superintendent Pollio with cabinet Chiefs during private meetings, principals during meetings and school visits, and outside vendors and partner organizations during public and private meetings. Additionally, staff reported that some new expenditures were added within the new-year budget after the Draft (January) and Tentative (May) budgets were approved by JCBE. Although Board members would be able to see and approve those added expenditures at the time of the September Working Budget, it was unclear to Finance staff whether Board members understood how new expenses contributed to the growing deficit.

An example of this was a section titled “Additional Expenses Since Balancing the Working Budget for FY 2023-24” in the FY24 Working Budget Report that outlined \$33.5M of total increase to expenses that were added later and not originally included in the financial allocation for the budget.²⁰² Superintendent Pollio would make additions to the current-year budget and “hide it” in the final budget, according to Finance staff. Furthermore, Finance staff noted they did not have the opportunity to communicate with the Board about budget changes or new spending after the adoption of the Working Budget. These procedural and communication gaps reflected a lack of clear roles, responsibilities, and decision-making authority when it came to spending approvals and budget changes.

²⁰⁰ “[Jefferson County Board of Education Policy 04.1 Fiscal Management: Budget Planning and Adoption.](https://policy.ksba.org/Chapter.aspx?distid=56)” Jefferson County Board of Education Policy Manual. Published July 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

²⁰¹ “[Jefferson County Board of Education Policy 04.31 Fiscal Management: Fiscal Accounting and Authority to Encumber/Expend Funds.](https://policy.ksba.org/Chapter.aspx?distid=56)” Jefferson County Board of Education Policy Manual. Adopted/Amended March 27, 2018. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

²⁰² Jefferson County Public Schools FY 2023-24 Working Budget Report. September 2023. [PDF].

In their FY26 Audit Plan, the Internal Audit Department included a plan to “assess the end-to-end process for initiating, vetting, authorizing, and communicating modifications to the working budget, both additions and reductions.”²⁰³ The assessment of modifications to the budget was included in the Internal Audit Department FY26 work plan because budget development, balance, and responsiveness was the most frequently cited risk in the risk questionnaire completed by 67 participants from the JCBE, the Superintendent’s Office, and Chiefs and other division leaders.²⁰⁴ According to Internal Audit staff, the risk questionnaire is an annual survey conducted by Internal Audit and given to the Board and District leaders to understand their perspectives on what they perceive as areas of risk for the District. Internal Audit uses the results of the risk questionnaire as the foundation for follow-up conversations with Board and District leaders and to frame the annual risk assessment.

New JCBE Policy to Tighten Fiscal Controls

As of Fall 2025, staff reported that a new Board policy will be developed and implemented to address this communication gap between Finance staff leaders and the Board. The October 20, 2025 Policy Committee meeting summary references, “An amendment to require that a new funding allocation made after the adoption of the working budget must include the specific amount of the allocation.” Staff described the planned new policy and practice that would include a standing Board meeting agenda item dedicated to “budget status” to inform the Board of any budget additions that were not allocated in the September Working Budget. For any single dollar added that was not originally included in the Working Budget, Finance staff leaders would be required to put the details in the finance update agenda item to serve as a notification to the Board to let them know there is a new budget allocation. This proposed new policy is meant to be a mechanism to provide transparency to the Board and open a channel of communication between Finance staff and the Board.

The exam team believes that these planned policy changes will support increased transparency to the Board and open channels of communication between Finance staff leaders and the Board. To augment these new policies and efforts to increase transparency and communication, the exam team also recommends that Finance staff leaders should lead all budget and finance-related presentations to the Board and should be given the opportunity to answer the Board’s finance-related questions that come to the administration in writing or verbally during meetings. The exam team also recommends that in addition to providing the Board with ongoing updates regarding expenses added to the budget, the Board should be given updated revenue and expense projections between the September Working Budget and the May Tentative Budget.

²⁰³ Jefferson County Public Schools Internal Audit Department Audit Plan. 2025-26. Published August 2025. [PDF].

²⁰⁴ Ibid.

Recommendations	
4.11.a	JCPS should update JCBE Policies 04.1 and 04.31 to clarify budget-related roles and responsibilities and decision-making authority.
4.12.a	JCPS should develop specific standard operating procedures and definitions that correspond to JCBE Policies 04.1 and 04.31 and delineate the appropriate budget controls and processes for requests and approvals related to changes to the approved budget. Finance staff leaders should lead this effort and collaborate with the Internal Auditor, Superintendent, ARMAC, and members of the Board, as appropriate, in the development of these procedures.
4.13.a	JCPS should continue with implementation of proposed new policy requiring budget status updates from Finance staff to the Board any time a change has been made to the adopted budget.
4.14.a	Finance staff leaders should lead all budget and finance-related presentations to the Board and should be given the opportunity to answer the Board's finance-related questions that come to the administration in writing or verbally during meetings, which should occur more regularly to cut down on the Board's information gaps. The Board should also be given updated revenue and expense projections between the September Working Budget and the May Tentative Budget. These practices should augment the efforts of the new "budget status" policy update to increase transparency to the Board and open channels of communication between Finance staff leaders and the Board. These changes should be outlined in updated standard operating procedures.

Statute

Observation	
4.15	The JCPS Superintendent and members of the Board may have been out of compliance with KRS 160.550 between the budget years reviewed of FY22-26.

KRS 160.550(1) states that "no superintendent shall recommend and no board member shall knowingly vote for an expenditure in excess of the income and revenue of any year, as shown by the budget adopted by the board and approved by the Kentucky Board of Education, except for a purpose for which bonds have been voted or in case of an emergency declared by the Kentucky Board of Education."

The statute goes on to outline the consequences for districts not in compliance and the role that the Kentucky Board of Education will play during the time the district works to resolve its budget issues. KRS 160.550(2) dictates that "any school district having authorized an expenditure in violation of subsection (1)...may be so certified at any time by the Kentucky Board of Education." It goes on to say that the district must cease spending funds, including hiring, purchasing, and contracting, unless the Chief State School Officer (the Kentucky Department of Education Commissioner) has approved in writing that the expense is sound and necessary. Subsection (3) states that the district would continue to require expenditure approval from the Commissioner until the Kentucky Board of Education has approved the district's budget for the following year. Subsection (4) states that any person who is "knowingly" in violation of this statute is liable.

Superintendent Pollio presented multiple versions (Draft, Tentative, and Working) budgets to the Board annually from FY22-FY26 in which expenses exceeded new year revenues in every iteration. The Board approved those budgets. Since the Fund Balance was used to cover excess spending, it is unclear, to what extent, Superintendent Pollio and the Board understood that new year expenses were higher than new year revenues. Therefore, it is difficult to say whether the criteria for "knowingly" is met, as described in KRS 160.550(4). The conclusion is JCPS Superintendent Pollio and the Board may have been out of compliance with KRS 160.550 between FY22-26 (the budget years examined). The Board's understanding of the budget is discussed in more detail in **Chapter 2: JCPS Board of Education**.

Although the JCBE Policy 04.31 on Fiscal Accounting and Authority to Encumber/Expel funds does include KRS 160.550 as a listed reference footnote (a resource that guided the development of the policy), the

policy language itself does not include anything about the Superintendent or Board knowingly recommending or voting for an “expenditure in excess of the income and revenue of any year, as shown by the budget adopted by the Board.”²⁰⁵ Since JCBE does not appear to have a corresponding Board policy that explicitly aligns to KRS 160.550, it is unknown as to whether the Board was aware of this statute. During the September 16, 2025 Board meeting presentation on the budget, presenting Finance staff noted, “The law requires us to have a balanced budget...the challenge is we’ve engaged in a practice because we had the cash flow to do it to have larger and larger deficits every year. So that’s why we are in the situation where we are kicking the can down the road and a future Board is going to have to make hard decisions. You are now the future Board.”²⁰⁶

To date, the Kentucky Board of Education and KDE have not publicly identified JCPS as being out of compliance with KRS 160.550(1), nor have they enforced the provisions described in KRS 160.550(2), (3), and (4). KRS 156.010(1)(f) requires KDE to monitor the management of school districts, “including administration and finance.” KRS 157.060 requires the Kentucky Board of Education to obtain from each school district a report “showing in detail all funds received from the state and from all other sources during the year, and a detailed statement of all expenditures for the year.” Finally, KRS 160.431(4) requires KDE to obtain and review a school district’s “detailed annual financial report to include the district’s total assets, liabilities, revenues, and expenditures.” With all this required monitoring of a school district’s finances, and the clear negative financial path JCPS has been on for at least three fiscal years as outlined above, it is unknown how the Kentucky Board of Education and KDE missed that trend or, if that trend was known, why they took no action to help rectify it. Unfortunately, the actions of the Kentucky Board of Education and KDE are outside the scope of this examination.

Recommendation	
4.15.a	The Board should update JCBE policy to explicitly align to KRS 160.550(1) that the Superintendent and Board should not recommend or vote for an expenditure in excess of income and revenue of any year, as shown by the budget adopted by the Board.

Jefferson County Board of Education Role

Observation	
4.16	Gaps in knowledge of school finance and budgeting existed among District leaders and JCBE members, resulting in a variable range of understanding of short- and long-term implications of JCPS fiscal decision-making and budgeting.

Board Member Engagement and Understanding of District Finances

In interviews, focus groups, and in the survey, a common perception across many stakeholder groups was that JCBE members lacked awareness and understanding of school district finance and the JCPS budget deficit. The exam team also interviewed Board members and reviewed public Board meeting minutes and recordings to analyze the role of the Board as it relates to District finances, including the statutory obligations in managing those finances like KRS 160.550 mentioned above. There appears to be a range of engagement and understanding among Board members as it relates to District finances. Examples of this include:

- All Board members were invited to participate in 1-1 budget meetings with Superintendent Pollio in 2025 to discuss budget cuts. Not all Board members participated. Staff present in those meetings shared that many of the Board members questions were more focused on cuts to

²⁰⁵ “[Jefferson County Board of Education Policy 04.31 Fiscal Accounting and Authority to Encumber/Expel Funds.](#)” Jefferson County Board of Education Policy Manual. Adopted/Amended: March 27, 2018. Retrieved November 26, 2025.

²⁰⁶ “[Jefferson County Board of Education September 16, 2025 meeting.](#)” Retrieved March 9, 2026. <https://www.youtube.com/watch?v=UEPb4x63WAs>

individual programs that would impact their Board District constituents rather than questions or concerns about the budget and deficit as a whole.

- The types of questions and comments from Board members during Board meeting finance presentations show a range in depth of understanding regarding District finances and accountability for their role in the District's deficit.
 - The nature of the questions and comments from Board members in the September 16, 2025 Board meeting showed that there were varying degrees of understanding of the budget deficit among Board members up until that date. A Board member commented that the meeting's presentation was a "level of transparency we didn't have one year ago." Finance staff noted the information was the same as past presentations but presented and communicated differently.
 - Not all Board members appeared to understand what the Fund Balance is, a foundational component of understanding the District's cash flow and budget deficit, as was showcased in the questions asked during the January 20, 2026 meeting.
- Some Board members are reportedly more engaged and active in their questions and communications with Internal Audit and the ARMAC committee, particularly as it relates to District finances.
- Staff and Board members reported at least one Board member was shown the District's forecasting model in Spring 2025 that showed the existing and projected budget deficit, giving the Board member deeper insight to the situation prior to the alarm bell that was sounded by District Finance staff at the September 2025 Board meeting.
- Board members with longer tenures have had more exposure to messaging regarding budget concerns. A longstanding Board member recalled and referenced the concerns regarding excessive spending that were communicated to the Board during the former CFO's final budget presentation to the Board on August 29, 2023, in which the CFO said "for FY24, the Working Budget reflects an expense exceeding revenue difference of \$242M dollars." At that August 2023 Board meeting, the CFO noted the Fund Balance was sufficient to cover the revenue gap for the fiscal year. The CFO also said there should be discussion soon to get revenue and expenses balanced and that the Board needed to be aware that excessive spending (relative to years past) was not sustainable. There was discussion in that meeting that the Board was going to need to make hard decisions in future budget years.²⁰⁷

Responsibility

School Board members are ultimately responsible for their district's finances, and JCBE is no exception. The CFO and Superintendent manage the day-to-day fiscal operations, but the Board approves the budgets and sets the fiscal policies. The Kentucky School Board Association School Board Manual states, "the local board, through its policies, is responsible for developing a budgeting process that includes planning and reporting to the community...Board members should become knowledgeable enough about the budget and process to be able to discuss and share with constituents."²⁰⁸

Given JCPS's current financial crisis, it is clear JCBE must improve its financial oversight and knowledgeability as well as decision-making authority. While JCBE should take advantage of the resources available to it by other parties (e.g., ARMAC and data provided by district personnel), it is expected of Board members to be able to parse through, interpret, and understand JCPS's complex financial matters. The Board cannot solely rely on second-hand information when formulating budget projections and plans.

Training

In interviews, several Board members referenced opportunities for professional development, including conferences and training held by the Kentucky School Board Association (KSBA) and the National School

²⁰⁷ "[Jefferson County Board of Education August 29, 2023 meeting](#)". Retrieved March 9, 2026.

https://www.youtube.com/watch?v=iU0BHq_yfeA

²⁰⁸ "[School Board Leadership Guide](#)." Kentucky School Board Association. Revised 2024. Retrieved November 27, 2025. www.ksba.org.

Board Association (NSBA), as well as ongoing training through the JCBE contract with the Council of Great City Schools (CGCS). However, the details regarding individual Board member participation in training (including what types and dates/frequency) is unknown.

In the survey open responses, multiple stakeholder groups called on a need for financial expertise among Board members and administrators to be able to better manage the \$2.3B JCPS budget and address the existing financial crisis. In interviews with a wide range of District leaders and staff as well as Board and Board committee members, the need for Board finance training was identified.

KRS 160.180 outlines the in-service training requirements for Kentucky school board members. Board members with less than two years of consecutive service must complete three hours of school finance training within their first two years of service. School finance training is not a required training topic for school board members with greater than two years of consecutive service. Prior to 2024, this statute required annual finance training for all board members (varying number of hours based on experience). This requirement shift—that now allows new board members to serve up to two years without any school finance training and for more longstanding board members to serve without ongoing school finance training—has been detrimental, according to some staff.

JCBE could voluntarily exceed what is required by state law and pursue a more expedited training schedule for new board members and a regular training cadence for more tenured board members on risk-related topics, such as school finance. Given the challenging nature of understanding school finance and the responsibility that the Board carries in overseeing and approving a District organizational budget of over \$2.3B, pursuing school finance training beyond what is required in statute could bring major value to the Board's knowledge and understanding of the JCPS budget.

Recommendation	
4.16.a	The Board should pursue school finance training beyond the required schedule and participants mandated by Kentucky state law.

Internal Audit and ARMAC

Finding	
4.17	ARMAC is a strong committee with extensive expertise that is an underutilized resource to the Board to advise on risk management processes and fiscal oversight. The Board has not had regular ARMAC report-outs at Board meetings and only recently established a formal Board member liaison role to the committee.

The JCPS Internal Audit Department performs independent and objective evaluations to improve effectiveness of JCPS's governance, risk management, and compliance activities.²⁰⁹ As detailed in **Chapter 3: Internal Audit**, Board members can communicate and ask questions of Internal Audit staff. This happens through verbal and written communication as well as meetings between Board members and Internal Audit staff. One Board member reported holding quarterly virtual meetings with Internal Audit to stay apprised of what the Internal Audit Department is working on and what the Board member needs to know as a Board member. This practice of oversight, the Board member claimed, was helpful and suggested that other Board members would benefit from doing the same.

According to staff, the Board recognized years ago that they needed financial expertise and capacity to support their role in fiscal oversight and decision-making for JCPS. ARMAC was formed in the 2018-19 school year to help provide this advising support for the Board. The purpose and membership of ARMAC is described in detail in **Chapter 3: Internal Audit**. The membership and its collective expertise is highly regarded by all stakeholders with close knowledge of the committee. Stakeholders who have worked with

²⁰⁹ "Building Bridges, Not Burning Them." Jefferson County Public Schools Internal Audit. Retrieved February 9, 2026. <https://www.jefferson.kyschools.us/page/internal-audit>

the committee describe them as competent and resourceful businesspeople who ask good questions to help formulate better strategies. According to staff and Board members, the members of ARMAC bring expertise from their professional life and experience and fulfill the requirement to “collectively possess knowledge in accounting, external auditing, internal auditing, governmental fund accounting, financial reporting, operational risk management, and strategic risk management.”²¹⁰

According to the Chair of ARMAC, who has served since its inception, the committee has historically met at least quarterly and often more frequently, depending on need. ARMAC has latitude in determining its focus areas each year based on District needs of that time. The committee’s agenda is informed by the annual risk assessment conducted by the JCPS Internal Audit Department and the annual audit plan it produces, the work of external auditors, and areas of risk brought to the committee by the Superintendent, staff, or Board members. For example, in 2023, ARMAC was focused on operational aspects of the District during the JCPS transportation challenges. In the last two years as focus has turned to District finances, ARMAC has been briefed on the District’s budget-related risks. According to finance staff, ARMAC has always received District financial reports over the years of its existence. Staff noted that historically, ARMAC had not reviewed budgets prior to January 2024, when it was presented with a Draft Budget that showed a major deficit.

Staff noted the committee structure and purpose is well-designed, but communication and engagement from the Board with ARMAC has not always functioned as intended. There is a lack of clarity about how information was passed from ARMAC to the Board. For ARMAC to function as an independent, advising committee to the Board, the model relies on Board members to take the initiative by requesting committee presentations or reports at Board meetings, asking the committee questions, and seeking advice from the committee. Stakeholders noted it is not the committee’s role to make decisions for the Board, but rather to identify the key risk management processes that help the organization function efficiently and effectively and advise on those processes.

The scope, membership, meeting cadence, and basic structure of ARMAC is sound. The committee is well-positioned to continue to provide risk oversight and continue to serve in an advisory capacity to the Board on areas of risk, including the budget process. However, the Board, in coordination with District staff who support ARMAC, should update the charter to explicitly include the District budget process as a standing annual topic. ARMAC should be briefed by the CFO on any risk-related financial matters, including the budget process, on an annual cycle that allows ARMAC to fully review and assess risks in advance of the Board’s draft budget adoption cycle. ARMAC report-outs should also be included on the Board agenda on a regular basis to increase communication. The committee membership in school year 2025-26 did not include a member of the Board; however, Board leaders met with ARMAC regarding the budget process several times after Dr. Yearwood became Superintendent and designated a board member as ARMAC liaison. This dedicated ARMAC liaison role is critical for improving communication between ARMAC and the Board of Education and formalizing the ARMAC advising and communication process with the Board. Recommendations related to ARMAC are listed below and in **Chapter 3: Internal Audit**.

²¹⁰ “[Building Bridges, Not Burning Them](https://www.jefferson.kyschools.us/page/internal-audit).” Jefferson County Public Schools Internal Audit. Retrieved February 9, 2026. <https://www.jefferson.kyschools.us/page/internal-audit>.

Recommendations	
4.17.a	Board members should communicate regularly with Internal Audit to practice oversight and stay apprised of areas of risk.
4.17.b	The Board should continue to use ARMAC in its advising capacity as a committee to the Board on key risk management processes, including the District budget process.
4.17.c	JCPS staff, in coordination with ARMAC and the Board, should update the ARMAC charter to explicitly include budget process as a standing annual focus area.
4.17.d	JCPS staff, in coordination with ARMAC and the Board, should align ARMAC meeting cadence and Board presentations to align with budget cycle milestones, allowing ample opportunity for review and advising support to the Board related to budget process.
4.17.e	The Board should leverage the new Board member ARMAC liaison role as a communications channel between the committee and the Board.

Budget Data & Reporting

Finding	
4.18	JCPS financial reporting documents and presentations are comprehensive but lack consistency and ease-of-understanding for the Board and a broad audience.

According to multiple cabinet and Finance staff, one of the challenges associated with understanding the JCPS budget deficit is understanding the District's financial report documents and, specifically, the District's cash flow (see the **Cash Flow in the General Fund** section for more detail). JCPS publishes multiple financial reports, detailed in Figure 66 below.

FIGURE 66: JCPS FINANCIAL REPORT DOCUMENTS

FINANCIAL REPORT NAME	Description
Budget Reports (Draft, Tentative, Working)	Three annual budget reports follow the budget cycle. Lengthy and detailed. Prepared by the Finance Division and presented to the Board for their vote of approval. Submitted to KDE.
Annual Comprehensive Financial Report (ACFR)	Prepared by the Finance Division and published by the Board in compliance with state and federal governmental accounting requirements. ²¹¹ Received certification by the Government Finance Officers Association since 2007. Includes audited financial statements required by KRS 156.265. Submitted to KDE.
Popular Annual Financial Report	Stylized, condensed budget report with highlights from the ACFR. Has received certification by the Government Finance Officers Association since 2017. ²¹²
Monthly Board Financial Reports	Monthly reports prepared for the Board by the Finance Division showing revenues and expenditures. Typically included on regular Board meeting consent agenda for approval.

Source: Data provided by Jefferson County Public Schools.

²¹¹ "JCPS Annual Comprehensive Financial Reports." Retrieved January 29, 2026. <https://www.jefferson.kyschools.us/page/comprehensive-annual-financial-reports>.

²¹² "FY25 JCPS Popular Annual Financial Report." Retrieved January 29, 2026. <https://www.jefferson.kyschools.us/documents/about/data-reports-and-research/comprehensive-annual-financial-reports/popular-annual-financial-report/592973>.

All of the financial reports are authored by the JCPS Finance Division. The primary audience and users of the reports are JCBE members. KDE also receives copies of select reports.

Budget Reports (Draft, Tentative, Working)

The budget reports prepared by the Finance Division for the Board at each stage of the budgeting cycle (Draft, Tentative, and Working Budgets) contain extensive information. The reports provide background information to help the reader better understand District priorities, policies, revenue sources, resource allocation to schools, and major programs and initiatives of the District to help demonstrate “how resources are used with the greatest intentionality and focus.”²¹³ The budget reports also provide detail on expenditures, including breaking down expenses by instructional level, recurrent versus one-time expenses, and listing out specific programmatic investments. The budget reports differ from the governmental fund accounting structure found in the ACFR (described below). The budget reports provide explanations and use terminology and definitions to help the reader understand complicated financial information.

While the detailed explanations, defined terminology, and connection to instruction level and program is helpful for understanding the budget reports, the volume of information they contain may make it difficult for readers to quickly find and understand the critical points. The budget report structure, sections, types of charts and fiscal data included has evolved over each iteration of the report between FY22-26, so no two budget reports look exactly alike in terms of structure. This makes it slightly more difficult to compare information from one version to the next. Despite the opportunities for improvement, the budget reports are detailed reports that carry significant importance—they are both approved by the Board and submitted annually to KDE. They are also the only JCPS financial report documents that explicitly referenced the budget deficit with clear supporting financial data and narrative explanations.

Every Working Budget report from FY22-26 included language and/or data showing expenses exceeding revenues. The FY24-FY26 Working Budgets explicitly called out the deficit between revenues and expenses, warned of a need to balance the budget, and provided the relevant data to show the deficit.²¹⁴ These reports were approved by the Board, made available to the public on the JCPS website, and reported to KDE. Specific examples of Working Budget references to the budget deficit are outlined in Figure 67.

FIGURE 67: FY24-26 WORKING BUDGET DEFICIT CITATIONS

FISCAL YEAR	Citations
FY24 Working Budget (P. 36-38, 48, 55-57)	- In the “Reflecting Back to Additions Made for FY 2022-23” section on P.55, the narrative reads, “The origin of the growing deficit between current-year expenses and revenues can be seen in the Summary section of the FY2022-23 Working Budget report.” A table detailing recurring and one-time investments that “affect our ability to balance the FY 2023-24 Working Budget” is included. - The “Summary” section on P. 57 states, “The FY 2023-24 Working Budget reflects a deficit of \$242,679,252 of new year revenue versus expenses. However, the beginning of year Fund Balance of \$434,961,210 is sufficient to cover this revenue gap for the coming year.”
FY25 Working Budget	In the “Investments for FY2024-25” section on P. 26, the narrative reads, “These investments are components of the growing deficit

²¹³ Jefferson County Public Schools FY 2024-25 Working Budget Report. September 2024. [PDF].

²¹⁴ Jefferson County Public Schools FY 2023-24 Working Budget Report. September 2023. [PDF];

Jefferson County Public Schools FY 2024-25 Working Budget Report. September 2024. [PDF];

Jefferson County Public Schools FY 2025-26 Working Budget Report. September 2025. [PDF].

(P. 26-27)	between current year expenses and revenue can be seen in the Summary section of the Working Budget Reports from prior years.” • In the “Revenue and Expense Summary” section on P. 27, a table shows the “Working Budget Expenses Exceeding Revenue” value of \$ (295,174,474) and narrative that reads, “Since our recurrent new year expenses exceed our new year revenues by \$295,174,474, the Beginning Fund Balance must be used to cover the difference as we have done for the past several years.” A table showing how the Fund Balance can cover the expenses exceeding revenue follows.
FY26 Working Budget (P. 9-10, 31-33, 35)	• In the “Prior Year Unused Salary Allocation” section on P. 9, the narrative reads, “Despite the greater Unused Salary Allocation since FY22, JCPS has continued to increase the General Fund deficit between recurrent annual revenues and expenses resulting in a falling Fund Balance and Contingency.” • A chart and narrative is included on P. 10 that highlights the decreasing Fund Balance and Contingency, and need for reduction to the District deficit. • A section and chart on the “Deficit Over Time” is shown on P. 33 • A section on “Factors Contributing to the Deficit” provides extensive detail on P. 32. with narrative warning about the need to reduce the deficit to maintain healthy fiscal standing.

Source: Jefferson County Public Schools FY24-26 Working Budgets.

Annual Comprehensive Financial Report

In addition to submitting the Working Budget report, JCPS is required to submit audited financials and the Annual Comprehensive Financial Report (ACFR or AFR) to KDE every year. On its website, KDE maintains copies of the ACFRs and audited financial statements for all school districts. The ACFR is reported using Generally Accepted Accounting Principles (GAAP) and follows the requirements and guidelines prescribed by the Governmental Accounting Standards Board and recommendations by the Government Finance Officers Association. This means that financial data is categorized into governmental or business-type activities, and assets or liabilities.

The FY25 ACFR Management’s Discussion and Analysis report section notes that:

General Fund expenditures were \$288.3 million under budget. Much of this amount was due to \$136.0 million budgeted but not spent in the contingency category. Other categories such as instruction, instructional staff support services, and plant operations and maintenance came in less than budget due to vacancies and lower state-paid benefits, such as teachers retirement match and health insurance for all employees. As a whole, our General Fund decreased fund balance by \$82.0 million, much of which was due to planned spending as we come off the fiscal cliff from COVID-Relief grants (ESSER) and right size our budget over a number of years.²¹⁵

This statement can be confusing to readers since it describes being “under budget” yet experiencing a “decreased fund balance” due to “planned spending” while also being in pursuit of right-sizing the budget. The corresponding financial statement data shows a declining Fund Balance and declining Net Position for

²¹⁵ “[Annual Comprehensive Financial Report For the Year Ended June 30, 2025](https://www.jefferson.kyschools.us/documents/about/data-reports-and-research/comprehensive-annual-financial-reports/annual-financial-statements/592972).” Board of Education of Jefferson County, Kentucky. Retrieved February 3, 2026. <https://www.jefferson.kyschools.us/documents/about/data-reports-and-research/comprehensive-annual-financial-reports/annual-financial-statements/592972>

the District, but a positive balance in assets versus liabilities. It is difficult to see a major budget deficit in the way the data is presented.

Furthermore, it is difficult to compare the financial data in the ACFR to the financial data in the budget reports, which present revenue by source and expenses by instructional level or fund category. The categorization and methodology used to present the financial data differs enough across these financial reports that they are not “apples to apples” for readers, even though they both contain audited data representative of the District’s financial position. The FY25 ACFR does not obviously show or call out a budget deficit of revenues to expenses in the same way that the FY25 Working Budget report does (see Figure 67).

Popular Annual Financial Report

The Popular Annual Financial Report is a condensed version of the ACFR and includes key highlights and excerpts of the financial data tables from the ACFR. Like the ACFR, it does not clearly show a budget deficit.

Monthly Board Financial Reports

The exam team reviewed agendas and Board meeting materials between February 2025 - February 2026 to identify financial reporting to the Board. JCPS Financial Division prepares monthly financial reports for the Board, which are available through Board meeting materials and are approved by the Board on the consent agenda during both work sessions and regular business meetings of the Board.²¹⁶ The financial reports are copies of the balance sheets used in the ACFR governmental accounting financial format and are accompanied by a “Notes of Interest” narrative report. This practice meets the requirements of KRS 160.431(4)(a) for the district finance officer to report on revenues and expenditures monthly to the board and to make the reports available publicly.

Areas for Improvement

One challenging aspect of understanding school finance data is due to the use of fund accounting. JCPS operates using fund accounting through the Municipal Information System (MUNIS), which is required by KDE and used across the various financial reports described above. The budget reports are the only financial document that presents financial data in formats beyond governmental fund accounting.

Fund accounting separates financial resources according to specific activities or legal requirements. It is used in government and non-profit organizations, including school districts, and emphasizes accountability and compliance rather than profitability. MUNIS requires fund accounts for the General Fund, Special Revenue Fund, Capital Outlay Fund, Building Fund, Construction Fund, School Food Service Fund, and Capital Assets Fund. JCPS financial reports often include charts and ledgers broken out by Fund Account. Each fund represents a separate group of accounts with its own revenues, expenditures, assets, liabilities, and fund balances. In fund accounting, typically funds are encumbered (reserved) for future expenses once a commitment is made to prevent overspending. In an exam interview, the Chair of ARMAC spoke to the complexities of fund accounting and the challenges for individuals without fund accounting experience in understanding the format and big picture of the organization’s finances.

The ARMAC Chair suggested that one way that may help budget reviewers understand the finances, would be for the JCPS administration to develop a simplified, non-GAAP version of the budget for JCBE. This alternative report could use a budgetary basis of accounting, which provides a way to see real-time cash flow of actual revenues and expenses and how they vary from what was budgeted.²¹⁷ This approach would highlight the District’s revenue collection timing and minimum cash flow needs for any given month.

²¹⁶ [Jefferson County Board Meetings February 2025-February 2026](https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89). Kentucky School Boards Association. Retrieved February 3, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

²¹⁷ “[Basis of Accounting versus Budgetary Basis](https://www.gfoa.org/materials/basis-of-accounting-versus-budgetary-basis).” Government Finance Officers Association. Board Approval March 8, 2019. Retrieved January 14, 2026. <https://www.gfoa.org/materials/basis-of-accounting-versus-budgetary-basis>

Regardless of what method is used for reporting financial data, JCPS should simplify its public financial report documents and Board presentations where feasible, while maintaining compliance with KDE requirements. Consistent terminology should be used and all terms should be defined. Financial data should not be buried in narrative, as it has frequently been done in past budget reports. A summary page should be included in budget reports with clear categories that are used consistently across all public reporting materials and should clearly show a balanced budget where expenditures do not exceed new year revenues.

Recommendations	
4.18.a	JCPS financial reporting documents and presentations should be updated where feasible while maintaining compliance with KDE requirements to include consistent, defined terminology and budget categories.
4.18.b	JCPS administration should provide regular reporting to the Board of real-time cash flow showing actual expenditures and revenues against budgeted amounts.

Looking Ahead

Improving Stakeholder Perceptions of JCPS Financial Management

In the exam survey, many school-based staff expressed negative feelings about budget shortfalls, noting that budget cuts impact student learning environments and teacher morale.

- Both school-based and Central Office staff respondents expressed frustration with what they perceived as poor management of the budget and called for more rigorous financial oversight.
- Both stakeholder groups believed that funds were not being managed effectively and that wasteful spending was occurring on unnecessary items as well as bloated administrative costs.
- Central Office staff from Exceptional Children Education (ECE) and Office of Multilingual Learners (OML) reported significant budget constraints, impacting their ability to provide necessary services.
- Many Central Office and school-based staff called for greater transparency, noting they did not know about the District's budget crisis until it was reported by the news media.

Community and family member responses to the exam survey expressed similar concerns about mismanagement of funds — with criticisms that JCPS is not a good steward of tax dollars and funds being wasted in areas that do not directly benefit educational needs, noting that more spending has not led to improved student performance.

Respondents across all stakeholder groups cited concerns with the lack of budget transparency.

These perceptions highlight a need for JCPS leadership — both the Board and administration — to take steps to increase education, transparency, communication, policy, and processes to support balancing the budget and improving stakeholder perceptions of the Board and administration's management of District finances.

FY27 and Beyond

The FY26 JCPS Working Budget includes a detailed section showing unmet funding needs — important items that have been delayed due to funding constraints. These items have not been budgeted for and many will increase over time due to depreciation, inflation, and enrollment demographics. Examples of these unmet funding items include:

- Updated salary schedules for competitive market pay rates (for certain hard-to-fill roles)
- COLA increases (annual)
- Increased bonding capacity to meet future facility construction needs
- Bus replacement to maintain operational fleet (annual)
- Chromebook replacement to maintain universal access for all students

- Contract management software
- Increasing teachers and counselors to reach recommended ratios

Finance staff emphasized these unmet funding needs will require attention and decision-making in the coming years.

In January 2026, JCBE approved the FY27 Draft Budget. Superintendent Yearwood and the CFO presented recommended cuts of \$142M, including \$44M in cuts to Central Office staff and reorganization and \$41M in cuts to supplemental and add-on programs.²¹⁸ The proposed cuts are subject to change as the District works through the budget cycle. Approximately \$40M in cuts still need to be made to reach a balanced budget. Superintendent Yearwood has shown signs of willingness to partner and work diligently with the Board to rectify the budget issues he inherited when he took the Superintendent role. Superintendent Yearwood has also made concerted efforts to engage stakeholders and create a feedback loop to help inform decisions about cuts to the budget.

JEFFERSON COUNTY PUBLIC EDUCATION FOUNDATION

This exam was focused on JCPS; however, it became apparent to the exam team that the fiscal relationship between JCPS and Jefferson County Public Education Foundation (JCPEF) was relevant to JCPS finances. Therefore, the exam team reviewed the relationship and structures between JCPS and JCPEF to identify areas for improvement in support of JCPS fiscal operations and District strategy. JCPS staff and JCBE members were interviewed and supported the JCPEF-related data and documentation collection for exam team analysis. JCPEF representatives were not interviewed or directly involved with the exam; therefore, the exam team acknowledges that future study may be necessary to fill in gaps and identify additional opportunities for increased transparency and communication as it relates to the relationship between JCPS and JCPEF.

LEF Context

Local Education Foundations (LEFs) are nonprofit 501(c)(3) organizations managed by a Board of Directors. LEFs are committed to improving education at the local level and provide supplemental funding to support programs and initiatives that align with the goals of local schools.²¹⁹ In addition to providing direct funding, LEFs can broaden support in their communities by convening and linking businesses, community organizations, and individuals to raise awareness and resources for schools. According to a 2019 article published by the KSBA in the Kentucky Schools Advocate magazine, at least 47 of the 173 Kentucky school districts had an affiliated non-profit organization. This practice is common, with over 18,000 education foundations nationwide.²²⁰ LEFs often have local school leaders, such as superintendents, as well as school board members, serving in an ex-officio or advising capacity to help ensure funds are spent in alignment with district goals and priorities.

Some advantages of the LEF model are:

- The LEF organizational structure gives donors a way to support local education and get a tax advantage by donating to a 501(c)(3) organization rather than directly to the school district.
- LEF funds can be invested so that the money can grow over time. School districts typically have restrictions around investing funds.

²¹⁸ Yearwood, Brian. "[Strategic Realignment & Budget Briefing](#)." January 20, 2026. Jefferson County Board of Education Meeting. Retrieved March 6, 2026.

<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52767&AgencyTypeID=>

²¹⁹ "[What is a Local Education Foundation?](#)" California Consortium of Education Foundations. Retrieved December 3, 2025. https://www.cceflink.org/about_ccef.html

²²⁰ "[Organizations supporting a single school of educational institution.](#)" Cause IQ. Retrieved December 3, 2025. <https://www.causeiq.com/directory/school-foundations-list/>

JCPEF Background

JCPEF is the LEF in Jefferson County. Its website describes JCPEF as an organization that “aims to be a catalyst for enhancing public education, advocating for excellence, and increasing awareness of the great successes in Jefferson County Public Schools. JCPEF identifies opportunities to invest in the future of JCPS schools, staff, and students by engaging community leaders and businesses.”²²¹ Some of their stated projects and funding priorities include leadership development programs for school-based staff, Ready4K Camp to support incoming kindergarten students, JCPEF E3 Equity Program to drive equality in supplemental enrichment funding and to support Choice Zone Schools, Academies of Louisville, Aspire Higher supports program for high-achieving, low-income, first-generation college, and/or minority students, and several events including the Baird Excellence Awards and the Superintendent’s State of the District.²²²

JCPEF and JCPS

Observation	
4.19	There are gaps in information and a lack of transparency regarding roles, decision-making, and financials between JCPS, JCBE, and JCPEF.

Management and Staffing

JCPEF is managed by a 19-member Board of Directors that represent community and business leaders in Jefferson County.²²³ The Foundation is supported on the JCPS side by three ex-officio members that include the Superintendent, the Chief of Diversity, Equity, and Poverty, and an Executive Administrator for Project Management. A JCPS administrative staff member also supports administrative and logistic functions between the District and Foundation and is listed as the JCPEF point of contact on the JCPEF page of the JCPS website.

Although not formally outlined in the job description, multiple staff noted that the Executive Administrator for Project Management plays a liaison role between the District and the Foundation. The Executive Administrator role supports community-based organization relationship management and is well-positioned to serve as a liaison between the District and the Foundation. The role sits in the Chief of Staff’s office and has a view of Districtwide strategy and cabinet-level operations as well as relationships with businesses and community leaders who wish to support JCPS. A major part of the liaison role is connecting prospective JCPS donors to the Foundation to make their JCPS-directed donation. As described above in the advantages of donating to a LEF, by donating to JCPEF rather than JCPS, donors receive a tax advantage and the funds can be invested. Despite supporting JCPEF in this way, the JCPS Executive Administrator for Project Management role is not listed as a contact on the JCPEF page of the JCPS website.

According to JCPS staff, the Foundation relies heavily on the superintendent to set the vision and goals for the District, which then informs funding priorities for the Foundation. Historically, the superintendent carried strong influence in identifying specific initiatives in which to direct Foundation funds. All final funding decisions are required to be voted on and approved by the Foundation’s Board.

MacKenzie Scott Funds

A Major Gift to Support JCPS

In 2022, philanthropist MacKenzie Scott made a donation of \$20M that has become a major source of funding for JCPS initiatives. The \$20M funds were received by JCPEF. According to multiple senior JCPS leaders, there was confusion about the intended recipient of the \$20M gift, with several staff claiming they

²²¹ “[About Us](https://www.jefferson.kyschools.us/page/jefferson-county-public-education-foundation),” Jefferson County Public Education Foundation. Retrieved December 2, 2025.
<https://www.jefferson.kyschools.us/page/jefferson-county-public-education-foundation>

²²² Ibid.

²²³ “[About Us](https://www.jefferson.kyschools.us/page/jefferson-county-public-education-foundation),” Jefferson County Public Education Foundation. Retrieved December 2, 2025.
<https://www.jefferson.kyschools.us/page/jefferson-county-public-education-foundation>.

heard it was a direct gift to Superintendent Pollio as an individual, rather than a gift to the District, and that Superintendent Pollio made the decision to place the funds in the Foundation. That narrative was relayed by the JCPS CFO in a July 29, 2025 Jefferson County Board of Education meeting, when the CFO said the MacKenzie Scott donation was given as a “completely unrestricted, direct give to Dr. Pollio to support his initiatives. Dr. Pollio placed the funds in the Jefferson County Public Education Foundation, which provides more aggressive investment opportunities than are available to JCPS.”²²⁴

The July 29, 2025 Board presentation included an updated plan drafted by the CFO and Superintendent Yearwood regarding use of the funds. Board members expressed questions and confusion regarding how the funding priorities were set, JCBE’s role in setting those priorities, and what the long-term plans were for unallocated invested funds. This Board meeting reflected longstanding confusion among multiple stakeholder groups, as well as a reflection of leadership turnover at JCPS and new JCBE members, about spending plans and decision-making authority around the major gift.

Original Grant Award & MOU

The original grant award letter, dated October 19, 2022, was sent by the National Philanthropic Trust, who administered the MacKenzie Scott funds. The letter is addressed to Franklin Jelsma, the Board Chair of JCPEF and Marty Pollio, Superintendent of JCPS, [care of] the Jefferson County Public Education Foundation, Inc. The letter states the donation was an unrestricted, one-time gift.²²⁵

An MOU between JCBE and JCPEF, effective as of the grant award letter date and signed in March 2023 by Superintendent Pollio and JCPEF Chairman Jelsma, outlines the agreed-upon plans for the gift. The primary components of the MOU can be summarized as follows:

1. Acknowledgement of the Foundation’s belief in the responsibility of the entire community to support Choice Zone schools in west Louisville neighborhoods.
2. A plan to build out the E3 Equity Program during the 2022-23 school year, including specifics on program components. According to JCPEF, the E3 Equity Program aims to drive equality in supplemental enrichment funding, support Choice Zone Schools, develop innovative engagement strategies, and create long-term community-wide fundraising campaigns for Choice Zone Schools. It also supports other JCPS schools, students, teachers, staff, and the community.
3. The major gift to be held in a separate “E3 Account” and invested to accomplish:
 - Immediate transfer of \$298,000 to be used for supplemental spending during the remainder of the 2022-23 school year (criteria to be developed and implemented by JCPS).
 - \$600,000 transferred from the E3 Account at JCPEF to JCPS every March and November, totaling \$1.2M per school year and \$6M over five years. These funds to be provided to the Choice Zone Schools.
 - Upon request made by JCPS, up to \$500,000 per year for five years (beginning 2023-24) to be transferred from E3 Account to JCPS for supplemental spending across all schools in the District, pursuant to criteria to be developed and implemented by JCPS, and communicated in writing to the Foundation.
 - Funds not required to meet the stated purposes outlined in the MOU would be placed into a perpetual endowment (an interest bearing money market account) to be created by the Foundation to create a perpetual source of funding for the E3 Equity Program. The funds would be guided by a plan to be developed by the Foundation.

The July 29, 2025 JCBE board meeting presentation from the CFO reported the following recent spending:

- Choice Zone Support: \$600,000 per semester for E3 purposes – Engagement, Environment, and Experiences

²²⁴ “[Jefferson County Board of Education July 29, 2025 Meeting](https://www.youtube.com/watch?v=30dAAyloeL4&t=7502s).” Retrieved November 20, 2025.

<https://www.youtube.com/watch?v=30dAAyloeL4&t=7502s>

²²⁵ Heisman, Eileen R. National Philanthropic Trust. Charitable gift letter. October 19, 2022. Provided by JCPS October 2025. [PDF].

- Supplemental Spending: \$500,000 per year for Districtwide initiatives and school-level spending, such as culture and climate initiatives
- \$1M over 5 years to Evolve502 for JCPS scholarships
- \$2.475M over 3 years to KentuckianaWorks to support Academies of Louisville

The Choice Zone support spending and the supplemental spending reported in July 2025 aligned with the original plans outlined in the MOU. The reported funding that went towards scholarships and Academies of Louisville support was assumed by the exam team to be part of the funding plan developed after the execution of the MOU. The CFO reported that \$3M out of \$3.2M spent through July 2025 had gone directly to schools and students. The remaining funds were spent on graduation support, community meetings, culture and climate, superintendent interviews, and advertising, according to the report.

Updated Plan for the Funds

When Dr. Yearwood became Superintendent, he worked with the CFO and Chief of Staff to develop updated spending criteria for the supplemental funds. The new spending criteria stated “funds will be allocated for purposes that promote student achievement.”²²⁶ Questions have been raised by the Board, and confirmed by JCPS staff, that there is not a concrete, long-term plan for spending of the endowed funds.²²⁷ Since the major gift was invested, the balance of funds that has not been drawn down for planned District spending has continuously grown in an interest-bearing account. According to financial records, at the end of FY25, JCPEF had \$19.6M in the E3 Equity Fund Investment to carry forward.²²⁸

Besides the original MOU, it is unclear if JCPS developed any subsequent formal plans and written documentation (as promised in MOU) regarding spending plans for the MacKenzie Scott funds, leaving uncertainty about details regarding supplemental spending and how the endowed funds will be spent over time.

Lack of Clarity in Cost Center and Fund Management

JCPEF has supported JCPS by funding many initiatives over the years, including scholarships, literacy funds, family learning and support services, mentoring, Kindergarten camps, student festivals, and college access programs. The MacKenzie Scott funds represented a 980% increase in level of funds managed by JCPEF and a major source of unexpected funding for the District.

JCPS staff provided the exam team with MUNIS balance sheets for a JCPEF fund that appears to hold all of the MacKenzie Scott donation funds. It is unclear if or why JCPS maintains the financial accounting records for JCPEF, where the funds are held, and who has access and control to be able to move the funds.

In FY22, a balance of less than \$2M was held in the JCPEF fund, according to the balance sheet records.²²⁹ In FY23 after the MacKenzie Scott gift, the balance in the JCPEF fund jumped to nearly \$21.6M.²³⁰

Examples of Shifting Expenses from General Fund to JCPEF Funds

As referenced in the **Budget Deficit** section, according to Finance staff, in May 2025, Superintendent Pollio shifted \$5.9M of expenses out of the General Fund to be covered by JCPEF to help meet the \$100M budget reduction goal for FY26.

²²⁶ Muns, Edward D. “[MacKenzie Scott Funds](#).” Presentation to the Jefferson County Board of Education. July 29, 2025. Retrieved November 20, 2025.

²²⁷ “[Jefferson County Board of Education July 29, 2025 Meeting](#).” Retrieved November 20, 2025.
<https://www.youtube.com/watch?v=30dAAyloeL4&t=7533s>

²²⁸ “2024-2025 Foundation Active Accounts.” June 30, 2025. Provided by JCPS. [Excel].

²²⁹ “FY22 Balance Sheet.” Fund: 7000 Jeff Cty Pub Ed Foundation. Provided by JCPS October 2025. [PDF]

²³⁰ “FY23 Balance Sheet.” Fund: 7000 Jeff Cty Pub Ed Foundation. Provided by JCPS October 2025. [PDF]

According to staff across multiple divisions, this request for JCPEF to cover \$5.9M in General Fund expenses was not immediately accepted by the Foundation and took time before JCPS and JCPEF settled on an agreement for those funds. The terms of the agreement are unknown. The expenses included:

- Amazon teacher account (\$3.5M)
- Louisville Urban League contract services for Kumon tutoring (\$1M)
- Teachers for implementation of the Compassionate Schools Social Emotional Learning (SEL) program (\$750K)
- Global Game Changers student empowerment program at Byck, Whitney Young, and Engelhard Elementary Schools (\$660K)

Another instance of shifting expenses from the General Fund to be covered by JCPEF funds occurred in June 2025 with the placement of a public-facing billboard congratulating Superintendent Pollio on his service to JCPS. At the request of the Board, Internal Audit reviewed the cost, funding source, and approval process associated with the billboard. Internal Audit found that the billboard design (\$800) was paid for using General Fund dollars. Internal Audit also found that the cost of the billboard placement (\$6,950) was originally assigned to a General Fund account but was subsequently changed and reassigned to a JCPEF project code.²³¹ The JCPEF project code represents District-controlled discretionary funds that originated from the MacKenzie Scott donation to JCPEF. In other words, these funds had already been transferred from JCPEF to the District, and per the MOU, a portion of the funds are considered supplemental spending for use at the Superintendent's discretion.

Lastly, it was reported that at its July 31, 2025 meeting, the Foundation's Board agreed to provide JCPS up to \$160,000 annually for two years from the MacKenzie Scott funds to support the Special Assistant to the Superintendent position established by Superintendent Yearwood.²³²

The lack of formal documentation following the original MacKenzie Scott MOU between JCPS and JCPEF along with lack of clarity regarding cost center, fund management, and using JCPEF funds to cover excess General Fund spending highlights issues related to transparency and decision-making between JCPS, JCPEF, JCBE, and the public.

Transparency

In terms of publicly available information about JCPEF, the exam team observed that JCPEF does not maintain an independent website (as previously noted it is currently a webpage hosted on the JCPS website) nor does the Foundation appear to publish an annual report or financials. The most recent IRS Form 990 available for the organization was from 2020.

In its standards guide for Local Education Funds, the Public Education Network (PEN) described best practices for LEFs. The guide notes that LEF funded programs should:

- Be guided by priorities set between its board and staff;
- Be informed by systematic visioning and strategic planning process every three to five years;
- Monitor results and effectiveness; and

²³¹ Porter, May. Internal Audit Director. "Information Collection and Analysis: Congratulatory Billboard for Dr. Marty Pollio and Similar Expenditures." JCPS Internal Audit Memorandum to the Jefferson County Board of Education. July 1, 2025. [PDF].

²³² Johnson, Krista. "[JCPS uses MacKenzie Scott grant to pay for Yearwood assistant.](https://www.courier-journal.com/story/news/education/2026/01/15/jcps-uses-mackenzie-scott-grant-to-pay-superintendent-assistant-salary/88161989007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z11xx41p119750c119750v11xx41d--xx--b--xx--&gca-ft=236&gca-ds=sophi)" Louisville Courier Journal. January 15, 2026. Retrieved January 16, 2026. <https://www.courier-journal.com/story/news/education/2026/01/15/jcps-uses-mackenzie-scott-grant-to-pay-superintendent-assistant-salary/88161989007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z11xx41p119750c119750v11xx41d--xx--b--xx--&gca-ft=236&gca-ds=sophi>

- Have clearly defined partnerships or collaborations with other organizations in which the goals and both operating and financial responsibilities are clearly defined.²³³

Furthermore, the guide offers financial disclosure best practices for transparency that include:

- Making basic informational data publicly available, such as IRS Form 990 and audited financial statements; and
- Producing publicly available reports, such as an Annual Report.

PEN notes that, to be effective, an LEF must maintain independence from the schools and districts that they interact with and hope to strengthen.²³⁴

An analysis of the JCPS peer district LEFs showed that in every instance, the LEF supporting the peer district maintained an independent website (.org) with posted financial and/or impact reports such as annual reports, IRS 990 Forms, grants and scholarships information, and donor information. Some, but not all peer district LEFs, included one or more local school district representatives to their Board (typically as a liaison or ex officio member). District roles represented on LEF Boards included Superintendent, Board member, educator, and other staff roles. Across all peer district LEFs, the websites were visually engaging with plentiful resources including success stories, news, special initiative highlights, and often extensive background information on organizational staff and Board member leadership.

Recommendations	
4.19.a	JCPS and JCPEF should collaborate to define a set of clear, written roles and responsibilities for JCPS staff, JCPEF staff and Board members, and JCBE members as it relates to funding strategy, fund management, and decision-making authority. This role definition process should be thoughtful about checks and balances, transparency, and clear lines of communication between members of these organizations and with the public (including potential donors).
4.19.b	JCPS and JCPEF should collaborate on opportunities to increase transparency and publicly available information related to strategy, impact, and financials.
4.19.c	JCPS and JPEF should collaborate to define an updated, long-range plan for the invested MacKenzie Scott (endowment) funds that were not allocated for specific purposes in the original MOU. • This plan should clearly communicate how spending plans align with District strategic goals and priorities and should include a recurring review cycle for JCPS administration to report out to JCPEF and JCBE on how those funds have been spent, related student outcomes, and other KPIs. • In coordination with this review cycle, JCPEF should report financial data related to endowment balance. • This plan should include financial projections conducted by a financial advisor that shows the expected annual returns on the invested funds to help JCPEF and JCPS make informed spending decisions based on how much money will be available in the future.

²³³ “[Standards for Local Education Funds](https://publiceducation.issueelab.org/?publisher=&wikitopic_categories=&keywords=&pubdate_start_year=1&pubdate_end_year=1&sort=&categories=&offset=0&pageSize=12).” Public Education Network. November 6, 2011. Retrieved March 5, 2026.
https://publiceducation.issueelab.org/?publisher=&wikitopic_categories=&keywords=&pubdate_start_year=1&pubdate_end_year=1&sort=&categories=&offset=0&pageSize=12

²³⁴ Ibid.

CHAPTER 5: HUMAN RESOURCES

Human Resources (HR) departments within public education fulfill a broad spectrum of responsibilities. HR professionals play a critical role in recruiting, evaluating, and retaining qualified personnel who align with both institutional objectives and students' needs. They oversee benefits administration to enhance staff satisfaction, develop professional development initiatives that promote ongoing learning, and design strategic policies supporting change management, health, safety, and employee well-being. Additionally, HR teams collaborate with external partners to address staffing shortages and facilitate the efficient operation of school systems.²³⁵

This chapter outlines practices, programs, and initiatives related to HR functions and responsibilities within JCPS.

HR ORGANIZATIONAL STRUCTURE

The HR Division uses a hybrid, zone-based human resources model. This approach centralizes HR strategy for core functions such as recruitment, employee benefits, and the management of personnel records. Zone-based HR teams also deliver specialized support to employees and hiring managers at the individual school level.

Following the transition from interim to permanent appointment in November 2024, the Chief of Human Resources has overseen and restructured the department into four key functional areas:

- **Recruitment:** Attracts candidates using job fairs and alternative certification pipelines.
- **Personnel Services:** Manages staffing decisions, oversees hiring processes, and aligns resources with District priorities.
- **Employee Services:** Handles benefits, ensures ADA compliance, manages workers' compensation, supports onboarding, and operates the Welcome Center.
- **Labor Management, Employee Relations, and Workforce Development:** Oversees evaluations, maintains records, conducts background checks, manages disputes, supports retention, and processes contract renewals.²³⁶

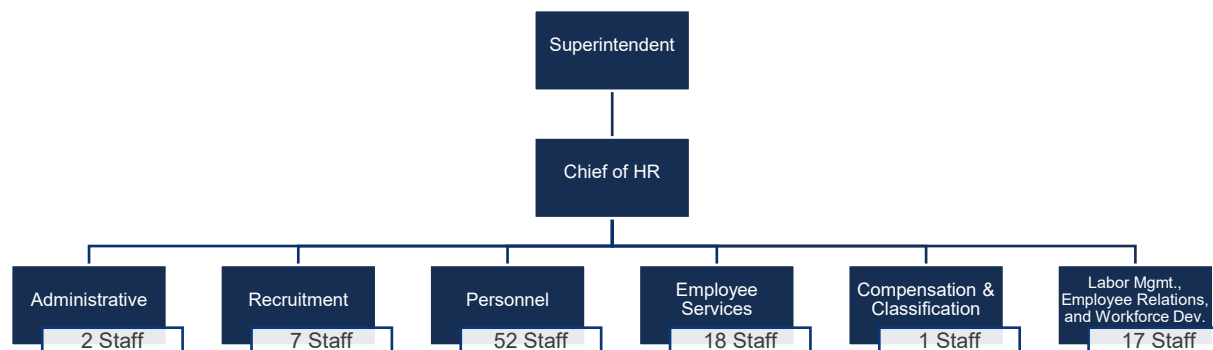
The Chief of HR reports directly to the Superintendent of Schools and is a member of the Cabinet, which aligns with organizational structures in five of six comparison districts. According to staff and the current job description, the Chief of HR position was reclassified in 2019 from a Director to a Chief-level position, which was a recommendation of the Council of the Great City Schools (CGCS) organizational review in 2018.²³⁷ There are two administrative positions that support the Chief of HR.

²³⁵ "Human Resources in Education: The Role & Challenges of HR in Schools." Edustaff. July 8, 2025. Retrieved January 13, 2026. <https://edustaff.org/blog/human-resources-in-education-the-role-challenges-of-hr-in-schools/>

²³⁶ "Jefferson County Public Schools Organizational Charts." Jefferson County Public Schools. December 9, 2025. Retrieved December 29, 2025. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/31e384d0-ae94-40eb-aecd-b23a8b9c4f07/BOARD-APPROVED-DECEMBER-9%2C-2025.pdf?disposition=inline

²³⁷ "Chief of Human Resources Job Description." Jefferson County Public Schools. June 11, 2019. Retrieved January 16, 2026. <https://drive.google.com/file/d/10TDE5SrbnpvFcuxfHISKa97kMxiae6ny/view>

FIGURE 68: JEFFERSON COUNTY PUBLIC SCHOOLS HUMAN RESOURCES ORGANIZATIONAL CHART, EFFECTIVE JULY 9, 2025



Source: Jefferson County Public Schools website.

During interviews, the Chief of HR emphasized the HR Division's wide-ranging responsibilities require strong collaboration with other divisions. HR staff noted recent structural changes to the organizational chart in recruitment, labor management, employee relations, and workforce development have strengthened the team's ability to serve job candidates, new hires, and current employees.

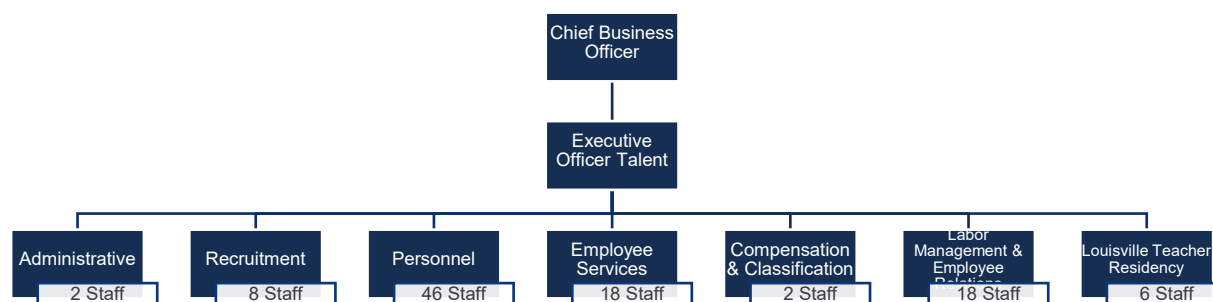
Based on interviews with HR leaders, the compensation and job classification functions in the organizational chart are underdeveloped for the District's needs as of December 2025. At the time of the interviews, two compensation analysts in the Personnel Department verified work history and placed new staff on the salary schedule — managing about 600 cases per year — and trained others on placement procedures. HR leaders clarified during interviews that the high volume of new hires that require confirmation of work experience to determine compensation, and adjustments for existing employees that earn a rank change or additional academic credit hours, limits their capacity to do analysis on measuring current compensation levels for some roles against industry standards. The Chief of HR expressed interest in expanding this benchmarking function. In response, the Board approved a new Director of Compensation and Classification position in July 2025, which will report directly to the Chief of HR. The District had not yet filled the role during the interviews.²³⁸ Regardless, the division must ensure that any restructuring supports both new and existing employees and aligns with the overall reporting structure.

Following interviews with District staff, the exam team reviewed the Board-approved proposal to reorganize Central Office effective July 1, 2026, which will update the reporting structure of HR as follows:²³⁹

²³⁸ "Director Compensation and Classification Job Description." Jefferson County Public Schools. July 9, 2025. Retrieved February 27, 2026. https://drive.google.com/file/d/1E2s2CQmLGC7fpPTqTgCrVtxWY-L_heDD/view

²³⁹ "February 13, 2026 JCBE Special Meeting Agenda." Jefferson County Board of Education. February 13, 2026. Retrieved February 26, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=>

FIGURE 69: JEFFERSON COUNTY PUBLIC SCHOOLS HUMAN RESOURCES ORGANIZATIONAL CHART, EFFECTIVE JULY 1, 2026



Source: Kentucky School Boards Association website.

The Chief of HR position will become Executive Officer of Talent, now reporting to the new Chief Business Officer rather than the Superintendent of Schools. This will add an additional reporting layer between the head of HR and the Superintendent of Schools. The HR structure is mostly unchanged, except that the Louisville Teacher Residency (LTR) unit is transferring from the Diversity, Equity, and Poverty (DEP) Division to HR. This change aims to better align recruitment and retention efforts for classroom teachers, as discussed with District staff. Additionally, an existing compensation analyst position that was previously within the Personnel Department will report to the new Director of Compensation & Classification, thereby enhancing functional alignment across these teams. Overall, the division will see a net gain of three positions, bringing the total to 101 staff members.

The following sections in this chapter discuss HR functions and structures based on the organizational charts current through June 30, 2026.

DISTRICT STAFFING AND RECRUITMENT

Community and educator perceptions about whether a school district is sufficiently staffed are shaped by experiences with tangible staffing shortages, role-specific gaps in service delivery, and equity considerations with staffing assignments. A 2022 RAND survey of K-12 principals nationwide revealed that over 50% reported frequent classroom coverage issues — primarily due to a lack of substitute teachers — particularly in low-income and minority-serving schools.²⁴⁰ National data from the National Center for Education Statistics' (NCES) School Pulse Panel indicates that around half of public-school leaders feel understaffed, particularly in special education, classroom aides, and mental-health roles.²⁴¹ District-level reports show that around 90% of superintendents made operational adjustments in response to shortages, including increasing substitute pay and hiring more support staff.²⁴²

Local community perceptions of schools are heavily influenced by staffing absences and coverage gaps, especially in instructional support roles, and are accentuated by staffing disparities, lack of substitutes, and funding volatility.²⁴³ Data transparency through surveys and media reporting further reinforces these perceptions. Figure 70 shows that 50% of JCPS family survey respondents expressed disagreement with

²⁴⁰ "Principal Perspectives on School Staffing Struggles: Findings from the 2022 Learn Together Survey," RAND Corporation. May 3, 2023. Retrieved January 12, 2026. https://www.rand.org/pubs/research_reports/RRA827-14.html

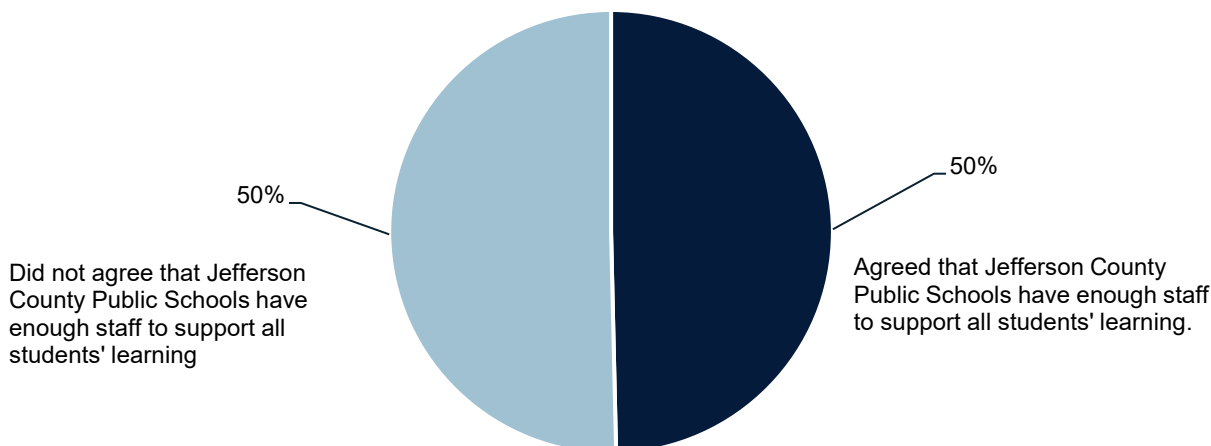
²⁴¹ Ibid.

²⁴² "Staffing, Budget, Politics, and Academic Recovery in Districts: Selected Findings from the Fall 2023 American School District Panel Survey," RAND Corporation. March 2024. Retrieved January 12, 2026.

²⁴³ "Districts Continue to Struggle with Staffing, Political Polarization, and Unfinished Instruction: Selected Findings from the Fifth American School District Panel Survey," RAND Corporation. 2022. Retrieved January 12, 2026. https://www.rand.org/content/dam/rand/pubs/research_reports/RRA900/RRA956-13/RAND_RRA956-13.pdf

the adequacy of school staffing, while the remaining half indicated that staff levels were sufficient. These data suggest there is room for improvement across the District, where staffing shortages and vacancies negatively affect the community’s experience and perception of a school’s staffing.

FIGURE 70: FAMILY PERCEPTIONS OF THE NUMBER OF STAFF IN JEFFERSON COUNTY PUBLIC SCHOOLS



Source: Special Examination Survey

Teaching Shortages and Vacancies

Observation	
5.1	The District must continue its efforts to reduce its teacher shortage.

From 2019 to 2023, Kentucky experienced a 260% rise in open teaching jobs, especially in high-demand fields such as physics, chemistry, high school mathematics, world languages, biology, and English as a Second Language (ESL).²⁴⁴ Nationally, the 2024–25 School Pulse Panel highlights ongoing staffing challenges related to vacancies and teacher certification in U.S. public schools, though conditions have improved slightly compared to last year.²⁴⁵ The national survey reported the following:

- Schools reported an average of six teaching vacancies before the school year.
- Seventy-four percent of schools reported facing difficulty hiring, primarily due to a lack of qualified candidates and too few applicants.
- Schools reported that Special Education and ESL positions were the hardest to fill.
- Staffing gaps were more pronounced in schools serving high-poverty communities and those with predominantly students of color, where fill rates lagged behind the national average.

National surveys highlight widespread staffing challenges nationwide, and JCPS reflects some of these same trends with persistent vacancies in high-demand teaching fields and support roles. These findings underscore the need for targeted recruitment strategies to address persistent shortages in critical areas.

²⁴⁴ “[Kentucky Public School Employee Staffing Shortages](https://legislature.ky.gov/LRC/Publications/Research%20Reports/RR486.pdf).” Legislative Research Commission. November 1, 2023. Retrieved January 7, 2026. <https://legislature.ky.gov/LRC/Publications/Research%20Reports/RR486.pdf>

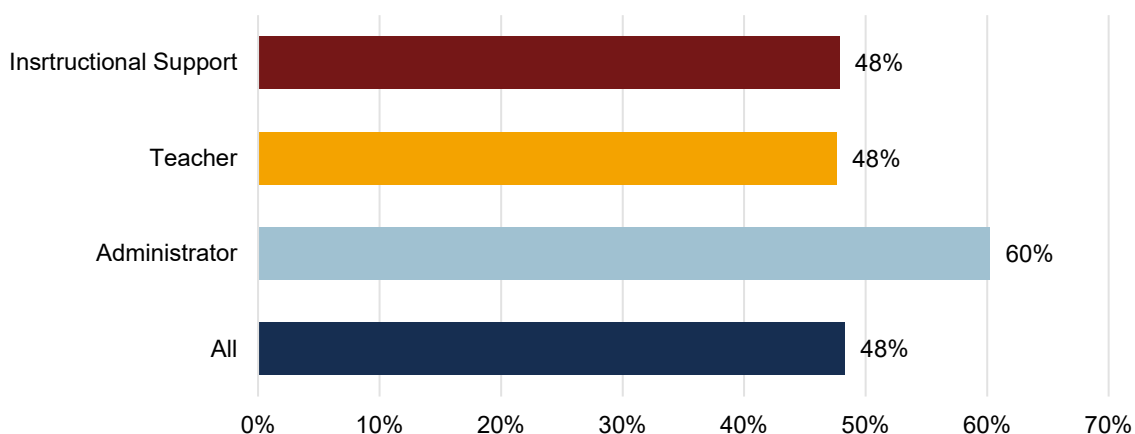
²⁴⁵ “[School Pulse Panel: Surveying High-Priority, Education-Related Topics](https://nces.ed.gov/surveys/spp/results.asp).” National Center for Education Statistics. July 2025. Retrieved January 12, 2026. <https://nces.ed.gov/surveys/spp/results.asp>

JCPS reported 6,226 full-time equivalent teaching positions in the 2024-25 academic year — nearly 15% of the approximately 43,000 teachers in Kentucky.²⁴⁶ Teaching positions in the District account for 44% of the total employed staff, the highest percentage since 2007. This percentage has been relatively steady for approximately 20 years, ranging from 41% to 44% during that timeframe. That figure is reflective of Kentucky’s average share of school staff that are teachers, which ranks about 45th in the nation (meaning most states have a higher share of teachers within their total school staff).²⁴⁷ Given that teachers comprise almost half of the District’s staff and fulfill an essential role, HR must minimize vacancies to prevent negative effects on daily school operations.

In November 2025, the Chief of HR informed the Board that about 222 certified teaching positions, or approximately 3% of the overall teaching positions, were not filled — mainly in Exceptional Child Education (ECE), secondary math and science, elementary classroom teachers, and itinerant teaching roles.²⁴⁸ Itinerant teaching roles include art, music, physical education, or special education services that travel to multiple school sites based on the assignment.

Figure 71 shows that nearly half of school-based staff in the JCPS Exam Survey, including instructional support and teachers, agreed that vacant positions in their school make their jobs harder. Administrators had the highest reporting of impact on their jobs as they often step in to cover unassigned teaching duties and manage the hiring process for vacant roles at their schools.

FIGURE 71: SCHOOL-BASED STAFF AGREEMENT WITH “VACANCIES AT MY SCHOOL MAKE IT HARDER FOR ME TO DO MY JOB WELL”



Source: Special Examination Survey.

During interviews and public reports, the Chief of HR noted that, despite efforts to reduce overall vacancies, schools face tough recruitment situations due to districts competing for the same small pool of qualified graduates from local universities and educator prep programs.

²⁴⁶ “[School Report Card Suite Dashboards 2024-25](https://reportcard.kyschools.us/home).” Kentucky Department of Education. Retrieved January 12, 2026. <https://reportcard.kyschools.us/home>

²⁴⁷ “[Estimated Growth in Annual Public Teachers’ Compensation in Kentucky](https://storage.ghost.io/c/53/d3/53d3d9df-ebef-488c-bde8-096c9490d2d8/content/files/2025/10/Growth-in-teachers--compensation-study-3.pdf).” Bluegrass Institute for Public Policy Solutions. March 20, 2025. Retrieved April 13, 2026. <https://storage.ghost.io/c/53/d3/53d3d9df-ebef-488c-bde8-096c9490d2d8/content/files/2025/10/Growth-in-teachers--compensation-study-3.pdf>

²⁴⁸ “[November 18, 2025 JCBE Work Session Meeting Agenda](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=).” Jefferson County Board of Education. November 18, 2025. Retrieved January 20, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=>

Recommendation	
5.1.a	The District's Recruitment Department should continue employing targeted efforts to reduce teacher vacancies.

Classified Shortages and Vacancies

Finding	
5.2	The District continues to experience shortages and vacancies in classified positions, which affect operations at both the school and district levels.

The District also continues to deal with staffing shortages and vacancies among “classified employees” who, as defined by KRS 161.011, are not required to have certification for his or her position. For instance, classified (or non-teaching) positions include custodians, bus drivers, and instructional assistants.

Nationally, the 2024–25 School Pulse Panel also highlighted the staffing challenges related to non-teaching vacancies, with 69 percent of schools reporting difficulties (down from 80% the previous year).²⁴⁹ Additionally, the School Pulse Panel noted transportation roles were most problematic, while administrative positions were largely filled.

- In Kentucky, statewide average salaries for classified staff in roles like food service, transportation, operations, and secretarial increased between 12% and 19% from 2019 to 2023.²⁵⁰
- During the same timeframe, average starting salaries for all classified position types in Jefferson County increased 12% or \$4,735 annually.²⁵¹

The Chief of HR reported that instructional assistants had 287 vacancies — the highest number compared to non-school-based classified roles and certified roles after the start of the 2025-26 school year.²⁵² District staff reported in interviews and site visits that, despite recent salary increases, hiring managers have observed classified employees opting for better-paying positions in the private sector. To address these vacancies, the District relies on collaboration between the HR Division's Recruitment Department, Personnel Services Department, and site-based hiring managers throughout the year to fill as many positions as possible with qualified candidates.

This challenge persists as a statewide issue. The average yearly earnings for K-12 education support professionals in Kentucky were \$28,088, placing the state 49th nationally.²⁵³ The persistence in the challenges identified by District staff, and in the data, warrants further study of the job duties and compensation for education support professional roles in the District.

Recommendation	
5.2.a	The District should review classified job duties and pay to address ongoing shortages.

²⁴⁹ “[School Pulse Panel: Surveying High-Priority, Education-Related Topics](#),” National Center for Education Statistics. July 2025. Retrieved January 12, 2026. <https://nces.ed.gov/surveys/spp/results.asp>

²⁵⁰ Ibid.

²⁵¹ Ibid.

²⁵² “[November 18, 2025 JCBE Work Session Meeting Agenda](#),” Jefferson County Board of Education. November 18, 2025. Retrieved January 20, 2026.

<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=>

²⁵³ “[2025 Reports: Educator Pay in America](#),” National Education Association. April 29, 2025. Retrieved January 20, 2026. <https://www.nea.org/resource-library/educator-pay-and-student-spending-how-does-your-state-rank>

Recruitment Department

The Executive Director of Recruitment oversees the Recruitment Department, which was established in 2022 and expanded in 2025. The department comprises seven staff members: three recruitment specialists (responsible for operations, certified, and classified personnel), a coordinator, an assistant coordinator, and a data technician. The team takes a proactive approach to vacancy management, conducts trend analyses, and collaborates closely with schools and other HR departments to support candidates in the early stages of the hiring process.

Since its inception, the Recruitment team has significantly reduced overall vacancies by prioritizing continuous improvement, leveraging data-driven practices, and fostering partnerships with both internal and external stakeholders to meet the District's staffing requirements. In November 2025, during a report to the Board, the Chief of HR highlighted that the Recruitment Department had participated in 47 job fairs and recruitment events, enhanced digital engagement across multiple social media platforms, and reduced total vacancies by 50% (from 928 on June 23, 2025, to 558 as of November 6, 2025). This is an improvement relative to previous recruitment cycles.

The District employs an array of recruitment strategies to attract, recruit, and retain qualified candidates:²⁵⁴

- Relocation Assistance
- Tuition Reimbursement
- Praxis Text Support
- Career Pathways and Professional Development

Additionally, the District is working to integrate alternative recruitment licensure pathways for certified staff, such as the Kentucky Department of Education's Option 6 University-Based Alternative Route and Option 9 Expedited Route, to broaden the pool of qualified applicants and address positions that are traditionally difficult to fill.²⁵⁵

- Option 6 permits individuals holding a bachelor's degree to begin teaching immediately under a provisional certificate while completing a post-baccalaureate preparation program and required assessments, typically within five years.
- Option 9 provides an accelerated three-year pathway for candidates to earn both a bachelor's degree and initial certification through a structured partnership between school districts and approved institutions, incorporating coursework and a residency component.

It is important to highlight the District's incremental decrease in the number of Emergency Provisional licensed teachers from 4.5% in 2021-22 to 1.6% (91) in 2024-25.²⁵⁶ An emergency teaching certificate, or emergency provisional license, is a temporary credential issued by the Education Professional Standards Board (EPSB) when a school district cannot find a fully certified teacher for a vacant position. This option exists to address critical teacher shortages, especially in high-demand subjects.²⁵⁷ The noted decrease suggests that the District's recruitment, development, and retention efforts have increased the total number of certified teaching staff in assigned areas, which ensures students have access to teachers trained in the area in which they are assigned to teach.

²⁵⁴ "JCPS Recruitment." Jefferson County Public Schools. Retrieved January 12, 2026.

<https://www.jefferson.kyschools.us/page/jcps-recruitment#clerical>

²⁵⁵ "Alternative Pathways to Certification." Kentucky Department of Education. Retrieved January 7, 2026.

<https://goteachky.com/resources/certification/alternative-pathways/KY>

²⁵⁶ "School Report Card Suite Dashboards 2024-25." Kentucky Department of Education. Retrieved January 12, 2026. <https://reportcard.kyschools.us/home>

²⁵⁷ "Emergency Certification." Kentucky Department of Education. April 1, 2025. Retrieved January 16, 2026. <https://goteachky.com/resources/certification/emergency-certification/>

Substitute Center

The Substitute Center Specialist in the Personnel Services Department oversees the District's substitute staffing (excluding bus drivers and administrators), leading an eight-member team and coordinating placements for about 3,000 substitutes through the District's Absence Management system. The automation offered through this software handles daily coverage assignments at the school level, and administrative staff reach out to HR for additional coverage when urgent vacancies arise.

The hiring process for substitutes remains flexible. It provides individuals with welcome materials and autonomy over their schedules while also including a recruitment pipeline for teaching roles. The team provides training and onboarding for substitutes, manages daily operations, hosts live sessions, troubleshoots issues, and maintains communication with schools and substitutes. HR staff noted that retaining substitutes is difficult for two primary reasons. First, the daily pay of \$175 for bachelor's degree holders may not meet the needs or expectations of candidates seeking higher pay. Additionally, top performers in certain roles often become full-time teachers. Although this poses a challenge for the Substitute Center, it also highlights the team's efforts to fill classified and certified vacancies in the District with engaged, qualified candidates.

The District has around 3,000 substitutes available to fill daily vacancies. However, many of these substitutes have limited availability or are assigned to specific schools. According to HR staff, the District needs between 500 and 600 instructional substitutes each day to cover absences and open positions. Long-term vacancies caused by resignations or extended leave during the school year are especially hard to fill — even with substitutes in the pool and a stipend provided to substitutes in long-term assignments. Staff noted several reasons for this challenge, including hesitation to work at certain schools, lack of experience with specific grade levels or subjects, and the appeal of flexible schedules that substituting offers.

Annually, the team uses electronic assurance documents to confirm substitutes' intent to return the following school year and assist those who lack technological access to these forms based on the assigned role (e.g., custodial staff). Scalable onboarding and centralized training have increased efficiency, but limited funding and staffing restrict personalized support and frequent school visits. The Substitute Center plays an important role of the Personnel unit, delivering staffing resources, onboarding, and teacher career pathways for those seeking career growth despite ongoing resource challenges in the District.

Louisville Teacher Residency

The District has seen success with its investment in recruiting, certifying, developing, and retaining staff through the LTR program. The LTR is a District initiative in the DEP Division focused on building a diverse and well-prepared teaching workforce.²⁵⁸ Launched in 2020 through a collaborative partnership with the University of Louisville and Bellarmine University, the program is structured to support candidates, including those relocating from out of state, by connecting them with the right certification pathways and placement opportunities. The Assistant Director works closely with HR recruitment to ensure candidates are screened and matched effectively, emphasizing a seamless entry into the District's schools.

Effective July 1, 2026, as part of the District's Central Office reorganization, the LTR team will transition to report under the new Executive Officer of Talent.²⁵⁹ This change will establish structural alignment between the LTR team and HR. Interviews with the LTR staff noted that central to the program's success are its certified teacher coaches who provide ongoing professional development, utilizing rubrics aligned with program expectations. Performance is carefully monitored through "scorecards" and regular meetings every

²⁵⁸ "[Louisville Teacher Residency](https://www.jefferson.kyschools.us/page/louisville-teacher-residency)." Jefferson County Public Schools. 2026. Retrieved January 20, 2026.
<https://www.jefferson.kyschools.us/page/louisville-teacher-residency>

²⁵⁹ "[February 13, 2026 JCBE Special Meeting Agenda](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=)." Jefferson County Board of Education. February 13, 2026.
Retrieved February 26, 2026.
<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=>

five weeks that assess both resident teachers and their mentors. Collaboration with principals at placement sites ensures that expectations are clear and consistently aligned with District standards.

While the program's comprehensive approach offers many advantages, some challenges exist. District staff reported that candidates who complete the program often encounter delays in securing permanent positions in the District due to the scheduling of coursework, degree conferral, and certification processes, which are typically completed during the final summer of the program. This timing can restrict their options for permanent placements, with District staff noting that many candidates accept positions in Enhanced Zone schools. The District offers a salary stipend to educators working in Enhanced Zone Schools, which benefit from increased support, oversight, and resources aimed at fostering student achievement and advancing school improvement as they are some of the highest-needs schools across the District. Additionally, the program's participation cost (approximately \$19,000) can be prohibitive even with available financial support, which includes: a \$3,000 scholarship given to all residents from a local community organization, HR tuition reimbursement of \$250 per credit hour, and access to other local scholarship opportunities.

The LTR program's collaborative efforts extend to working with EPSB and the Kentucky Department of Education (KDE), ensuring certification requirements are met and regulations are closely monitored. To date, the LTR staff confirmed during interviews that the program has trained 223 teachers (including 160 candidates of color) and supports certification in a broad range of subjects, including exceptional education areas as well as math, science, history, and language arts for middle and high school.

The program's impact is evident in its retention rates.

- The District staff reported the first graduating cohort of 27 teachers that started in 2020-21 was retained in the District at a rate of 86.3%, with members of this cohort earning tenure after four years of employment in the District in 2025.
- The second cohort of 29 teachers achieved a retention rate of 89.7%, slightly above the first cohort.
- The District's teacher retention rates for LTR completers exceed the national average, which stands at approximately 60% within the first five years of employment.²⁶⁰
- The District is committed to further increasing retention of LTR residency completers, with a goal of reaching 91% by 2027.

Mentor teachers and placement sites play a vital role in supporting candidates throughout their residency, contributing to the program's overall effectiveness in strengthening the District's pool of certified educators. Overall, this initiative serves as a model for the District's efforts to recruit, certify, develop, and retain educators Districtwide.

DISTRICT HIRING POLICIES AND PROCEDURES

Personnel Services Department

An Executive Administrator leads the Personnel Services Department — the largest in the HR Division with 52 staff members — and oversees the zone-based hiring process, certification, compensation analysis, and substitute management through the Substitute Center. The team organizes its structure across six primary staffing zones — three elementary, one middle, and two high school zones — while also supporting hiring for Central Office divisions. Staff working in these areas offer multiple services, including daily interactions with hiring managers and the Recruitment Department, assistance with tracking applications, as well as training and compliance support.

The Certification unit in the Personnel Services Department maintains close contact with Kentucky's EPSB and manages certification processes and compliance, especially for new hires, CTE candidates, and late renewals. When employees cannot secure certification, the team helps them transition to classified roles. The unit provides weekly updates on vacancies and shares hiring data with leadership to support HR's

²⁶⁰ “[Teacher Turnover: Stayers, Movers, and Leavers](https://nces.ed.gov/programs/coe/indicator/slc/teacher-turnover).” National Center for Education Statistics. May 2024. Retrieved February 26, 2026. <https://nces.ed.gov/programs/coe/indicator/slc/teacher-turnover>

data-driven efforts. In 2025, the HR staff was happy to report a reduction in certified staff vacancies and enhanced substitute coverage due to the strategic efforts and collaboration with the Recruitment Department to source and hire qualified candidates for vacant positions.

Job Descriptions

Finding	
5.3	The District does not have a formal procedure for auditing, updating, and posting all job descriptions to the public portal.

According to JCBE Policy 03.133 Duties (certified) and JCBE Policy 03.233 Duties (classified), every job in the District must have a Board-approved job description.²⁶¹ The job description document outlines the essential functions and qualifications for each role before it is posted publicly through the District's Applicant Tracking System (ATS). For certified roles such as teachers and administrators, KRS 160.380 requires that when a certification-based vacancy emerges within a local school district, the superintendent must notify KDE at least 15 days prior to filling the position. KDE oversees a state-level electronic registry of certified vacancies through the Kentucky Educator Placement Service (KEPS) to support the local hiring process for reported vacancies.²⁶²

The District's website offers a searchable database containing 956 Board-approved job descriptions, including those with multiple employees in similar roles.²⁶³ However, the exam team found that several roles listed on the District's organizational chart lack a published job description, indicating that the public-facing database is incomplete. When questioned, HR leadership confirmed this would be an important HR function to maintain, but there is currently no formal process for auditing or updating job descriptions on a specific schedule. Instead, job descriptions are updated when a role becomes vacant or is newly created and requires Board review and approval.

Recommendation	
5.3.a	The District should establish a clear process and schedule for regularly reviewing and updating job descriptions. HR should verify all job titles and duties reflect the actual functions being performed, reporting lines are consistent with the reorganization, and update as necessary.

Hiring Process

Finding	
5.4	Hiring managers report inconsistent levels of service delivery and support from HR teams with site-based hiring procedures and timelines across the District throughout the year, resulting in delays and inconsistency in finding qualified candidates for open positions.

The hiring process is managed by multiple HR departments and site-based managers at schools and Central Office. As a result, much coordination and collaboration is required to efficiently move candidates

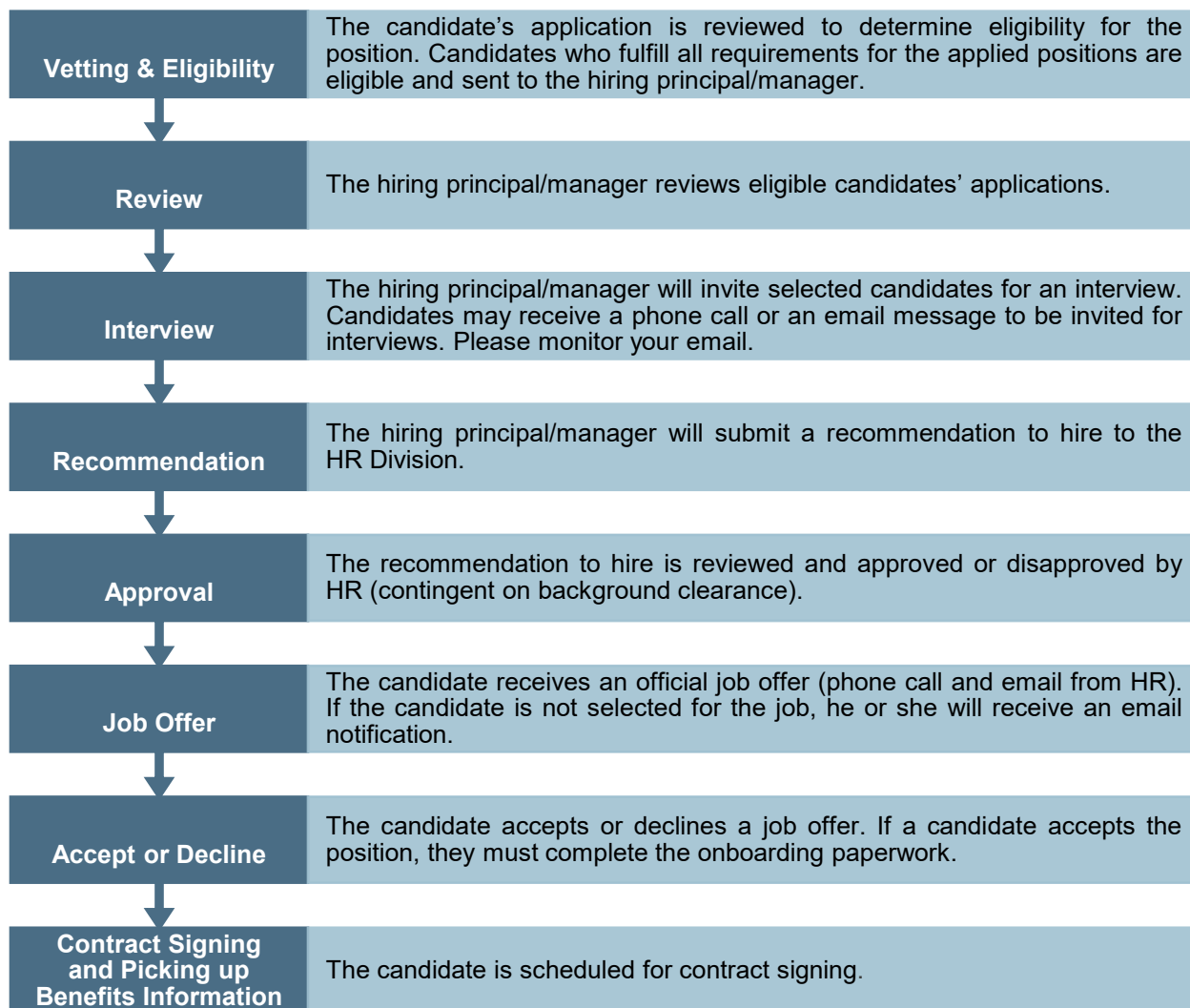
²⁶¹ "Jefferson County Board of Education Policy 03.133 Duties - Certified and 03.233 Duties - Classified." Jefferson County Board of Education Policy Manual. Adopted/Amended August 6, 2019. Retrieved January 12, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

²⁶² "Kentucky Educator Placement Service." Kentucky Department of Education. 2026. Retrieved January 20, 2026. <https://applications.education.ky.gov/keps/default.aspx>

²⁶³ "Job Descriptions." Jefferson County Public Schools. 2026. Retrieved January 12, 2026. <https://www.jefferson.kyschools.us/page/job-descriptions>

through each phase of the hiring process. The Personnel Services page of the District’s website explains the hiring process seen in Figure 72.²⁶⁴

FIGURE 72: JEFFERSON COUNTY PUBLIC SCHOOLS HIRING PROCESS



Source: Jefferson County Public Schools website.

The JCPS zone-based HR model aims to boost collaboration between Central Office HR and site-based administrators, yet hiring managers expressed that they face various challenges with the annual transfer process and inconsistent service delivery, causing onboarding delays for qualified candidates.

Annual Transfer Process

According to the Chief of Human Resources' report to the Board on November 18, 2025, the average elapsed time from posting a vacancy to a candidate's acceptance in 2025 ranged from 7.5 to 23.1 days.²⁶⁵

²⁶⁴ "Personnel Services." Jefferson County Public Schools. Retrieved January 9, 2026.

<https://www.jefferson.kyschools.us/o/jcps/page/certification#hiring>

²⁶⁵ "November 18, 2025 JCBE Work Session Meeting Agenda." Jefferson County Board of Education. November 18, 2025. Retrieved January 20, 2026.

<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=>

- Between August and October of each year, the timeline for hiring takes longer as school principals concentrate on school openings and operational matters, reducing their capacity to dedicate time to recruitment.
- Between February 1 and June 23 of each year, it takes less time to hire during the annual “transfer” process because the District is staffed to move hiring quickly.

Article 16 of the Jefferson County Teachers Association (JCTA) agreement with the Board details the annual “transfer” process for certified teaching positions.²⁶⁶ This policy allows current District teachers to apply for available roles for which they qualify in advance of the upcoming school year – either at their current school or another location – between February 1 and June 23 for Enhanced Support Zone schools and March 1 to June 23 for all other schools. During this period, only internal staff can apply, interview, and be chosen for open positions. From June 24 onward, the District may post any remaining vacancies after completing these internal transfers. At the July 8, 2025 work session of the Board, it was reported by the Chief of HR that of 1,024 classroom teaching positions posted on March 1, 2025, 662 were filled by qualified internal candidates by June 23, 2025, when the transfer window closed.²⁶⁷

Feedback from interviews with principals, hiring managers, and HR staff revealed the transfer process is a common topic of discussion. While everyone understood the rules and procedures, there was widespread agreement among hiring managers and HR staff that the system creates significant operational difficulties throughout each cycle. Principals and HR personnel noted the transfer process often delays hiring and makes it harder for the District to efficiently attract external candidates for known vacancies, as those positions cannot be advertised until after the internal transfer window closes on March 24 each year. Any changes to this process need to be negotiated between JCTA and the District. The current JCTA contract is set to expire in 2026.

Service Delivery

Interviews with principals and hiring managers reported inconsistent HR support, with communication and hiring delays often occurring when assigned staff are unavailable and no backup contact exists. Hiring managers find it difficult to balance HR coordination with their other responsibilities, particularly during peak recruitment seasons. During interviews, school-based administrators noted that secretaries do not have consistent access to the ATS. As a result, some hiring managers must manually retrieve candidate materials online, print them, and prepare for interviews outside of regular school hours. This process can contribute to delays in site-based hiring.

While some HR specialists were noted as highly effective during interviews, many principals said they feel forced to navigate complex systems alone, facing repeated application follow-ups, delays, and a lack of transparency in the process. Generally, hiring managers expressed the need for clearer HR guidelines and the delegation of administrative tasks to streamline the hiring process, which has many different HR departments and site-based personnel supporting each phase of the hiring process for a single vacancy.

Principals cited lengthy and inefficient HR procedures, especially before school openings each year, which cause delays and sometimes result in losing strong candidates to other districts or schools within the District. Required certifications and transfer policies contribute to onboarding delays and high turnover in high-need schools, pulling principals away from instructional leadership. Concerns over background check procedures were noted in focus groups, with instances where legal issues were discovered post-hire and

²⁶⁶ “[2018-2026 Agreement Between the Jefferson County Board of Education and Jefferson County Teachers Association](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/f13b55c7-13d1-49ad-a6df-e480352ad850/JCBE_JCTA_Contract.pdf?disposition=inline).” Jefferson County Board of Education. 2018. Retrieved January 12, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/f13b55c7-13d1-49ad-a6df-e480352ad850/JCBE_JCTA_Contract.pdf?disposition=inline

²⁶⁷ “[July 8, 2025 JCBE Work Session Meeting Agenda](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=51034&AgencyTypeID=).” Jefferson County Board of Education. July 8, 2025. Retrieved January 20, 2026. <https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=51034&AgencyTypeID=>

resulted in a rescinded job offer to the candidate. This procedural concern suggests a need for more thorough and timely screening to ensure compliance with Board Policy.

Recommendations	
5.4.a	JCPS leadership should work with JCTA to address the annual timing for the District's hiring windows to ensure maximum staffing efficiency and effectiveness.
5.4.b	The Personnel Services Department should implement policies and procedures consistently across all assigned zones, ensuring fair support for hiring managers and employees.
5.4.c	HR must ensure that candidates who do not meet minimum qualifications or who are disqualified through required pre-employment screening are promptly removed from the hiring process and are not advanced to an offer stage until all required clearances are confirmed and documented.
5.4.d	HR should review zone-based staffing assignments during busy hiring periods to maintain steady service for site-based hiring managers and prevent delays due to processing.
5.4.e	The District should assess ATS access levels for hiring manager assistants to prepare for site interviews.

STAFF DEVELOPMENT AND RETENTION

Observation	
5.5	Although the District does not have a Board policy specifying participation requirements for the New Teacher Induction Program, its program complies with KRS 161.031.

Staff On-boarding

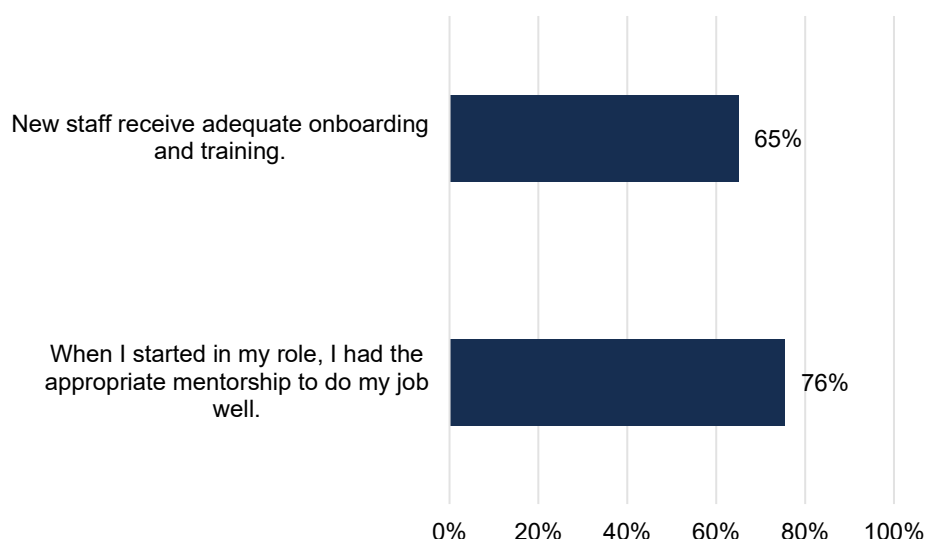
The Employee Services Department in HR is led by an experienced director with a staff of 17 who collectively manage leaves of absence, benefits, workers' compensation, and workplace accommodations, and provide support to the District's employees. The department on-boards over 1,000 new hires, serves approximately 14,000 benefit-eligible staff, processes open enrollment for all employees, and manages up to 5,000 annual leave cases. The onboarding process is predominantly focused on the completion of hiring paperwork before reporting for duty.

The onboarding function is divided in the HR Division with support from Employee Services and Labor Management, Employee Relations, and Workforce Development. The Employee Services Department supports new employees with benefits enrollment paperwork. while the Labor Management, Employee Relations, and Workforce Development Department manages the Welcome Center to support contract signing, securing technology hardware, and compliance training. Once complete, new hires work directly with the site-based hiring manager to determine additional training or mentorship relevant to the role.

New Teacher Induction

Mentoring is one component of a comprehensive induction program for new school-based employees. Different from onboarding, formal mentoring offers continuous relationship-driven support, where a seasoned colleague either volunteers or is designated to assist a new staff member in their professional development, problem-solving, and integration into the workplace culture over time. According to Figure 73, fewer than two-thirds of school-based staff surveyed in the JCPS Exam Survey felt that new hires receive sufficient onboarding and training. However, more reported having access to effective mentorship when they began their positions.

FIGURE 73: SCHOOL-BASED STAFF PERCEPTIONS OF TRAINING AND MENTORSHIP



Source: Special Examination Survey.

KRS 161.031 requires EPSB to develop standards and guidance for school districts that elect to implement new teacher induction and mentor programs. EPSB published the Kentucky Educator Mentorship Program (KEMP) guidance document in 2025.²⁶⁸ In accordance with the standards, if a school district chooses to implement a new teacher induction and mentorship program, the program must include core elements such as orientation, assignment of a mentor teacher within the first two weeks, a support team, and ongoing professional learning as part of their induction programs.

JCPS provides a “New Teacher Induction” program led by the Professional Development and Learning Team in the Academics Division.²⁶⁹ The website’s language suggests that the program targets both first-year teachers in the profession, teachers returning after a leave or employment elsewhere, and individuals new to the District but with prior teaching experience. The comprehensive one-year induction program for new teachers features 3.5 hours of on-demand training modules, formal mentoring, two in-person training sessions, and opportunities for real-time or recorded peer observation with feedback. Employees who participate earn professional development credits and can also opt for a stipend if they complete the activities outside of normal work hours. Based on this information, the District’s New Teacher Induction Program complies with the EPSB’s standards.

Mentoring New Teachers

Formal mentoring is one component of a thorough induction program for new employees. In 2024-25, the District reported 247 teachers with less than one year of teaching experience and 728 teachers with one to three years’ experience.²⁷⁰ Every first-year teacher is eligible to be paired with a school-based mentor for 15 documented hours of coaching and support each semester.²⁷¹ Mentors are described as “trained and experienced” and capable of providing a range of supports for first-year teachers, including co-planning, modeling, co-teaching, providing resources, and supporting the curriculum and general classroom.²⁷² The

²⁶⁸ “[Kentucky Educator Mentorship Program](https://goteachky.com/resources/professional-growth/kentucky-educator-mentorship-program/).” Kentucky Department of Education. October 3, 2025. Retrieved January 20, 2026. <https://goteachky.com/resources/professional-growth/kentucky-educator-mentorship-program/>

²⁶⁹ “[New Teachers](https://sites.google.com/jefferson.kyschools.us/professional-learning-and-deve/new-teacher).” Jefferson County Public Schools. 2026. Retrieved January 20, 2026.

²⁷⁰ “[School Report Card Suite Dashboards 2024-25](https://reportcard.kyschools.us/home).” Kentucky Department of Education. Retrieved January 12, 2026. <https://reportcard.kyschools.us/home>

²⁷¹ Ibid.

²⁷² Ibid.

guidance on the website does not clarify whether the District has a set of competencies that mentor candidates must meet to be selected for this role to support new teachers.

The exam team found no official Board policy on “Mentoring” or “Induction” for new employees. While the New Teacher Induction program fulfills the EPSB standards to offer support, participation by new employees is not mandatory. Further, while district staff frequently noted mentoring as essential (especially for those without traditional educator training), they also reported inconsistent implementation across schools. Principals and leaders varied in their accounts of formal mentoring practices, highlighting inconsistency at the school level where principals assign mentors.

Recommendation	
5.5.a	The Board should develop a formal new teacher induction and mentor program policy to ensure consistent implementation and participation across schools within the district.

Staff Retention

Observation	
5.6	The District’s lack of comprehensive staff retention data limits HR’s ability to analyze trends, identify root causes, and implement effective retention strategies for all role types in the district.

The Retention & Engagement unit in the Labor Management, Employee Relations, and Workforce Development Department supports nearly 18,000 District employees and prioritizes teacher retention. Led by an assistant director and a data technician, this team collaborates with colleagues across HR, Recruitment, Professional Development, Operations, and IT to implement and monitor retention initiatives. Though minimally staffed, this team supports school administrators and principals in fostering proactive solutions and consistent application of policies to support the retention of new teachers and staff in schools identified as having staff retention risks.

The Chief of HR reported in November 2025 that the overall retention rate for staff in the District between 2024-25 and 2025-26 was 95.8%.²⁷³ JCPS senior staff have observed, based on their experiences, that teacher movement between school sites has decreased over the past two years, indicating greater site-based stability within schools across the District.

However, multiple District staff noted additional concerns during interviews.

- Senior staff noted principal turnover has been especially high in middle schools over the past five years, making it more difficult to maintain consistent leadership and support for both new and existing staff at those schools.
- Reports from principals and hiring managers consistently note that classified staff are underpaid and experience high attrition rates due to misclassified roles and responsibilities relative to current pay scales.
- Central Office managers across several departments also expressed concern about multiple impending retirements, which are expected to affect critical operational functions unless intentional short-term succession planning is implemented.

²⁷³ “[November 18, 2025 JCBE Work Session Meeting Agenda](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=).” Jefferson County Board of Education. November 18, 2025. Retrieved January 20, 2026.
<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=52247&AgencyTypeID=>

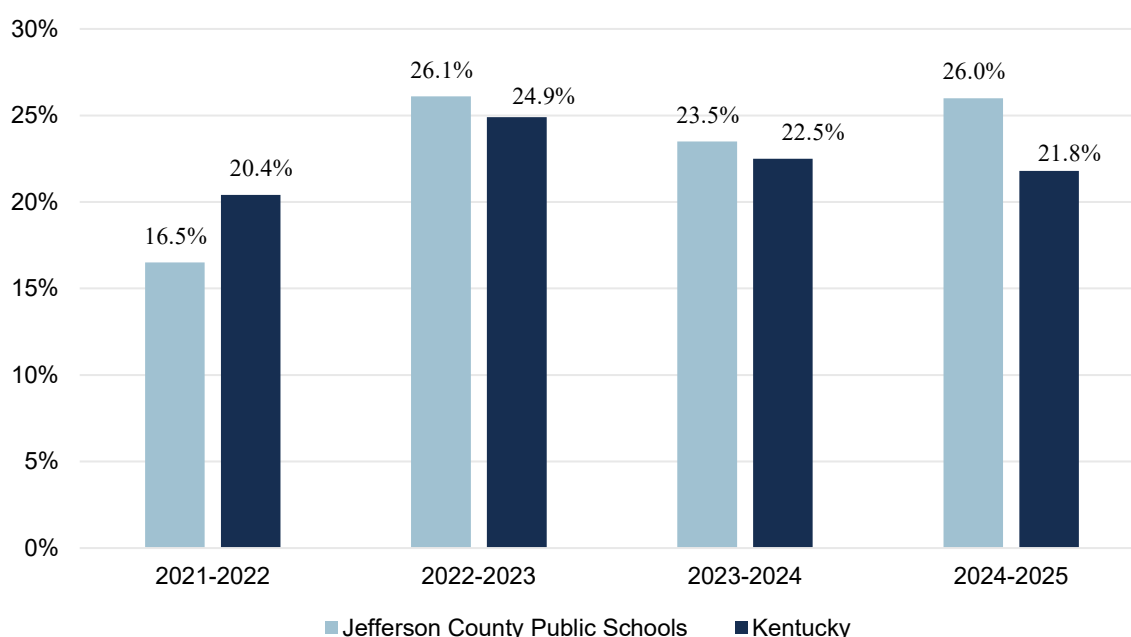
Teacher Turnover

HR staff cited research during interviews that replacing a teacher in the District can cost up to \$25,000 when considering expenses related to separation, recruitment, hiring, and training.²⁷⁴ The KDE Report Card Dashboard defines Teacher Turnover as:

This metric is used to determine the percentage of prior year teachers that do not return to teaching or new teachers that leave before the end of the school year. For the year of reporting, this includes teachers that left the school regardless of whether they were re-employed in another district, moved within their district, left the Kentucky Public School system, or retired. Teachers promoted to administrators are also considered as turnover.²⁷⁵

JCPS experienced a teacher turnover rate of 26% (2,019 teachers) in 2024-25.²⁷⁶ This figure is just above the state average and represents the largest segment of the District's certified workforce. As seen in Figure 74, since 2022-23, the District's turnover rate has been higher than the Commonwealth's:

FIGURE 74: TEACHER TURNOVER RATE IN JEFFERSON COUNTY PUBLIC SCHOOLS AND KENTUCKY, 2021-2025



Source: Kentucky Department of Education Report Card Dashboard.

Survey Data

The Retention & Engagement team relies on two main surveys to track staffing trends throughout the District. One of these is the Upbeat survey, which is conducted twice a year and collects information about teacher and staff retention to support leadership coaching in schools.²⁷⁷ The District first piloted this survey in 2021-22 in 18 school sites. Based on a 12.5% gain in teacher retention, the District launched the survey

²⁷⁴ "2024 Update: What's the Cost of Teacher Turnover?" Learning Policy Institute. September 17, 2024. Retrieved January 20, 2026. <https://learningpolicyinstitute.org/product/2024-whats-cost-teacher-turnover>

²⁷⁵ "School Report Card Suite Dashboards 2024-25." Kentucky Department of Education. Retrieved January 12, 2026. <https://reportcard.kyschools.us/home>

²⁷⁶ Ibid.

²⁷⁷ "Upbeat: A National Leader in Teacher Retention and Engagement." Upbeat. 2025. Retrieved January 20, 2026. <https://teachupbeat.com/>

in all 165 schools in 2022-23.²⁷⁸ In May 2024, Upbeat reported that partnering with JCPS led to improvements: a pilot in high-attrition schools increased retention by 12.5%, and District-wide expansion brought retention rates to nearly 95% and higher teacher satisfaction by 2023–24.²⁷⁹ Strategies included enhancing teacher voice, addressing generational wellbeing, authentic appreciation, and prioritizing diversity for teachers of color.

Principals and Central Office staff reported the Upbeat survey valuable for generating actionable data to improve school culture and guide targeted interventions, especially in schools with less than 80% retention rates. Annually, about 40–50 schools receive coaching support from the Retention and Engagement unit, though staffing may be inadequate for supporting all principals and new teachers in the District. Principals are provided with additional resources to support new and existing teachers including a checklist of principal actions and stay interview questions to boost retention efforts at the school level.²⁸⁰

HR personnel noted the District allocates funding for licenses to conduct the annual Upbeat survey among certified school staff in 152 schools, resulting in some sites being consolidated into single reports. Given the value of these data in revealing teacher retention trends at both mid-year and year-end, they recommended expanding this licensure investment to include classified staff, if feasible, to similarly assess trends and support needs in school operations and transportation.

The second data source for retention is the District's voluntary exit survey, which is administered by HR to employees who resign from their positions. In accordance with KRS 160.382, the District reports exit survey data to KDE.²⁸¹

HR staff reviews responses from the District's voluntary exit survey to identify reasons for staff departures and to spot patterns in timing, causes, or demographics. These findings shape the District's retention strategies. However, interviews reveal the survey is incomplete since it is not mandatory for exiting staff to complete and because some response options lack specificity. As illustrated in Figure 75, exit survey data from the past four years cite the self-reported reasons for leaving employment with the District:

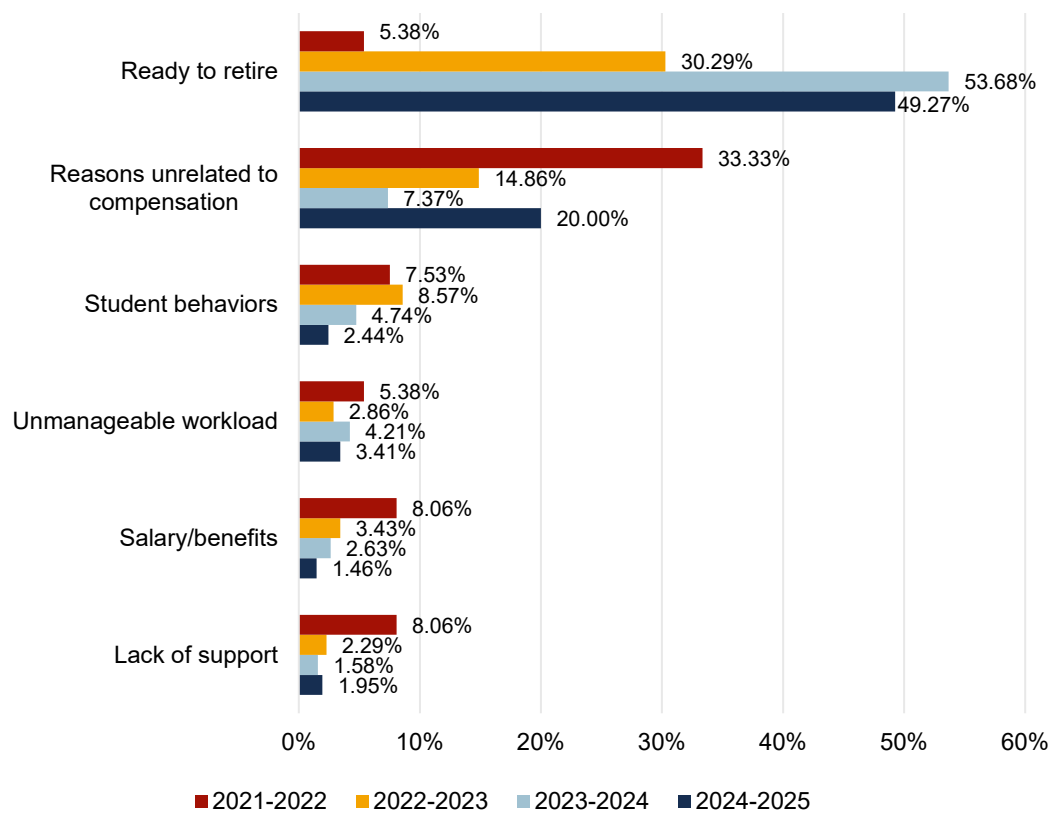
²⁷⁸ Marietta, G. "[Tackling Teacher Retention with a Multi-Faceted, Wole-Person Approach in Jefferson County Public Schools](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/6afb40f2-6e5e-4e47-aaa7-c89375614d92/Upbeat_Jefferson_County_Teacher_Case_Study.pdf?disposition=inline)." Upbeat. May 2024. Retrieved January 16, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/6afb40f2-6e5e-4e47-aaa7-c89375614d92/Upbeat_Jefferson_County_Teacher_Case_Study.pdf?disposition=inline

²⁷⁹ Ibid.

²⁸⁰ "[Employee Retention & Engagement](https://www.jefferson.kyschools.us/o/jcps/page/employee-retention)." Jefferson County Public Schools. Retrieved January 7, 2026. <https://www.jefferson.kyschools.us/o/jcps/page/employee-retention>

²⁸¹ "[Exit Survey](https://goteachky.com/resources/grow-your-own/educator-retention/exit-survey/)." Kentucky Department of Education. Retrieved January 20, 2026. <https://goteachky.com/resources/grow-your-own/educator-retention/exit-survey/>

FIGURE 75: TOP REPORTED REASONS FOR LEAVING JEFFERSON COUNTY PUBLIC SCHOOLS IN EXIT SURVEY, 2021-2025



Source: Data provided by Jefferson County Public Schools.
 Note: Exit survey is optional and the data above does not reflect all employees who have left the District since the 2021-2022 school year. The exit survey had 186 responses in 2021-2022, 175 responses in 2022-2023, 190 responses in 2023-2024, and 205 responses in 2024-2025 (756 responses in total across four years).

Recent data show that since 2023-24, more employees have left their positions due to retirement or reasons unrelated to salary. Very few point to pay, insufficient support, or student behavior as their main motivation for leaving the District. This pattern indicates the District may be experiencing an increase in retirements rather than just facing typical recruitment challenges. Multiple factors could be contributing to this trend. If the current exit survey questions do not clearly reveal why staff are departing in more detail, revising these questions could offer better insight into employees’ reported reasons for leaving.

Recommendations	
5.6.a	The District should further invest in biannual classified staff retention surveys to better track trends and inform retention efforts.
5.6.b	HR should revise the District’s exit survey for all employees to include targeted questions about why employees leave, making the data useful for retention.

Staff Evaluations

Finding	
5.7	The District utilizes a paper-based evaluation system for approximately 18,000 employees, which significantly affects integrated processes related to data collection, entry, and annual on-site storage.

The Executive Administrator of Labor Management, Employee Relations, and Workforce Development leads 16 staff members who manage labor relations across five collective bargaining agreements and regularly communicates with union leaders. The team manages employee relations (grievances, discipline, etc.), contract renewals, retention, staff evaluations, and collaboration with the District's General Counsel's Office for support with case management. They ensure compliance through real-time support, train administrators, and provide employees with the appropriate channels to access policies, procedures, and requests related to these areas.²⁸² Under new leadership, the division aims to advance the District's strategic goals and staff well-being by increasing efficiency, providing data-driven support, and strengthening labor relations.

The District provides comprehensive, role-specific policies and procedures for staff evaluations, which are publicly accessible through its website.²⁸³ These procedures encompass both certified and classified personnel, ensuring that all educators, specialists, administrators, and classified staff are evaluated through clearly defined frameworks and standardized processes. For certified staff, the Certified Personnel Evaluation Plan is anchored in the Kentucky Framework for Personnel Evaluation and delineates domains, evidence sources, and evaluation cycles in accordance with Kentucky state statutes.²⁸⁴ Classified staff evaluations similarly follow structured annual or multi-year cycles with defined expectations, documentation protocols, and opportunities for appeals, all aligned with Kentucky's statutory guidelines.²⁸⁵

Discussions with HR leaders, Central Office staff, and principals revealed the District uses both electronic and paper-based evaluation methods. Digital platforms like TalentEd Perform are used to enter ratings, record observations, and track professional growth plans. However, many aspects of the evaluation process—such as conference summaries, disciplinary and special forms, employee acknowledgments, and working folders—are still handled on paper. Evaluators must print documents at the start of the year for employees undergoing evaluation and later scan completed paperwork to send to HR. HR staff then need to organize, input, and file these paper documents for all evaluations, which is a time-consuming task each year.

Handling staff evaluations for nearly 18,000 employees using a largely paper-based process, even with scheduled multi-year reviews, is highly challenging. Physical documents and manual filing raise the risk of errors, delays, and inconsistent processes. These systems demand significant human effort for organizing, storing, and retrieving records, which can overburden staff and increase the chance for mistakes. Additionally, relying on paper makes it harder to access evaluation data quickly, reduces transparency, and leads some staff to see the evaluation system as outdated or unfair compared to streamlined digital alternatives. Although JCPS leadership is testing electronic solutions to tackle these problems, the District's

²⁸² “[Administrator's Guide to Labor Management & Employee Relations](#).” Jefferson County Public Schools. March 2024. Retrieved January 20, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/a05decba-81e8-402d-95b3-011996d51c11/Administrators_Guide_to_Labor_Management_and_Employee_Relations_.pdf?disposition=inline

²⁸³ “[Employee Evaluations](#).” Jefferson County Public Schools. 2026. Retrieved January 20, 2026. <https://www.jefferson.kyschools.us/documents/departments/human-resources/employee-services-department/labor-management-%26-employee-relations/employee-relations-forms/594002>

²⁸⁴ “[Certified Personnel Evaluation Plan](#).” Jefferson County Public Schools. July 31, 2023. Retrieved February 26, 2026. <https://drive.google.com/file/d/1B5xRi3ySou6htf9zixBKK3MjGLV5qZsC/view>

²⁸⁵ “[Classified Employee Evaluation Instructions](#).” Jefferson County Public Schools. July 6, 2023. Retrieved February 26, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/01400bed-ef55-4ff3-8c39-a6046f18f054/Instructions_for_Evaluation_of_Classified_Supp.pdf?disposition=inline

ongoing dependence on paper forms remains unpopular and poses obstacles to effective record management, accuracy, and perceptions of fairness and modernization in the evaluation process.

Recommendation

- 5.7.a** The District should procure and implement a comprehensive electronic performance management system to streamline employee evaluation procedures districtwide.

TEACHER RATIOS AND COMPENSATION

Teacher ratios and compensation are central to understanding the District's ability to deliver high-quality education and retain staff. This section examines how staffing levels, student-to-teacher ratios, and pay structures impact classroom conditions, student outcomes, and workforce stability. By exploring both quantitative data and the broader context of state compliance and District initiatives, the following section aims to provide a comprehensive view of how these factors shape educational experiences and inform strategic planning for the future.

Student-to-Teacher Ratio

Student-to-teacher ratio refers to the number of students assigned to each teacher. It is a structural measure that shapes how much individual attention learners receive and how manageable teachers find their workloads—a factor linked to classroom engagement, instructional quality, and overall learning conditions. Districts that maintain appropriate class sizes as measured by student-to-teacher ratio is one evidence-based strategy to improve educational outcomes.

Outcomes related to this ratio depend on factors such as grade level, student demographics, teacher workload, and the presence of support staff. Generally, smaller class sizes benefit academic achievement and classroom atmosphere, especially in early grades and high-need environments. Reducing class size can notably boost student performance in reading and math during early schooling.²⁸⁶ However, class size alone does not guarantee better learning; other instructional elements like the quality of teacher feedback, clarity, and available resources play an important role in student success.²⁸⁷

KRS 157.360(5)(a) sets class size limits for public schools: no more than 24 students per teacher in kindergarten through third grade; 28 in fourth grade; 29 in fifth and sixth; and 31 for grades seven through twelve. Districts may temporarily exceed these caps under specific exemptions: up to five extra students in grades 4–8 before September 15, or up to two additional students in grades K–12 after September 15 with district justification and a plan to reduce class size. If K–3 classes exceed the limit, an aide must be added.

School-based Decision Making (SBDM) schools follow these ratios and require exemptions only for special education caseloads. For mid-year enrollments, districts can operate above caps for up to three weeks before rebalancing or requesting an exemption. Compliance is checked by KDE on September 15 and January 31, and classes exceeding the cap by no more than two students in the final month of the school year are considered compliant without further exemption. There are no known violations in JCPS.

During the 2024-25 school year, the District maintained an average student-to-teacher ratio of 15 to 1, a figure that has remained consistent from 2007 to 2024. The following outlines average student-to-teacher ratios across the District by school level for the 2024-2025 school year:

- In elementary schools, the average student-to-teacher ratio was 14.8 to 1.
- In middle schools, the average student-to-teacher ratio was 15.9 to 1.

²⁸⁶ Shin, J., & Chung, J. "[Class Size and Student Achievement in the United States: A Meta-Analysis](#)." January 2009. Retrieved January 16, 2026.

https://www.researchgate.net/publication/286826662_Class_size_and_student_achievement_in_the_United_States_A_meta-analysis

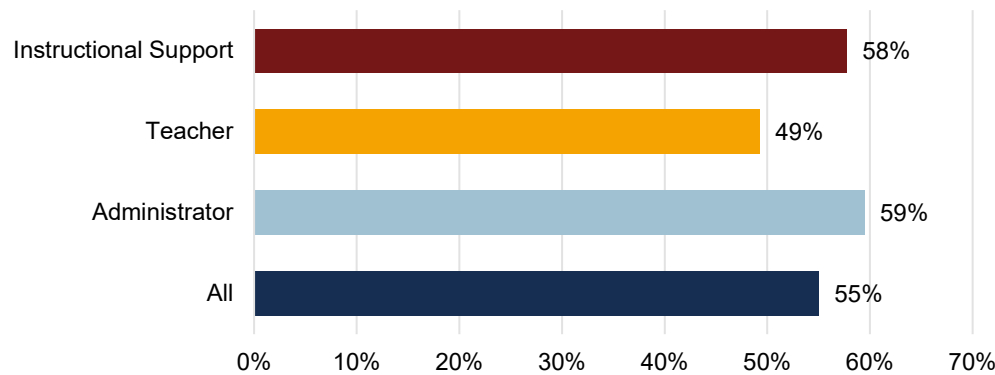
²⁸⁷ Hattie, J. "[The Paradox of Reducing Class Size and Improving Learning Outcomes](#)." 2005. Retrieved January 16, 2026. <https://www.sciencedirect.com/science/article/abs/pii/S0883035506000607>

- In high schools, the average student-to-teacher ratio was 15.5 to 1.

Since 2016, hiring more teachers has reduced the student-teacher ratio from 17 to 15, improving student access to teachers. With more than 160 schools within JCPS, however, various factors can affect how this ratio plays out in individual schools

Figure 76 shows that 55% of school-based staff indicated on the JCPS Exam Survey that the student-to-teacher ratio in classrooms supported effective instruction. Administrators and instructional support staff reported higher favorable responses at 59% and 58%, respectively, whereas teachers expressed less satisfaction, with only 49% responding favorably overall.

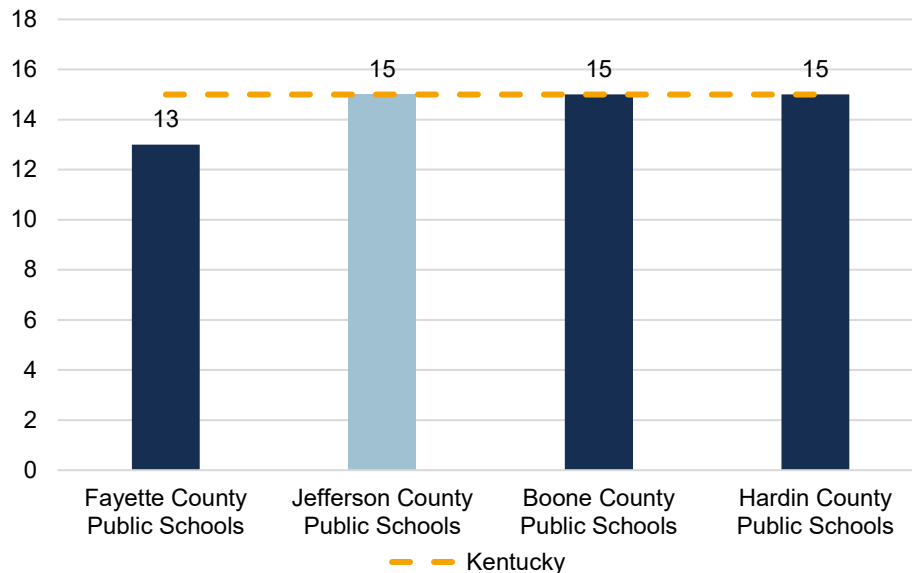
FIGURE 76: SCHOOL-BASED STAFF AGREEMENT WITH “THE STUDENT-TO-TEACHER RATIO IN CLASSROOMS ALLOWS FOR EFFECTIVE INSTRUCTION.”



Source: Special Examination Survey.

Figure 77 shows that the average student-to-teacher ratios using 2024-25 data are similar for JCPS, BCS, and HCSD at 15:1 — which align with the Commonwealth’s reported average — while FCPS has a lower ratio of 13:1.

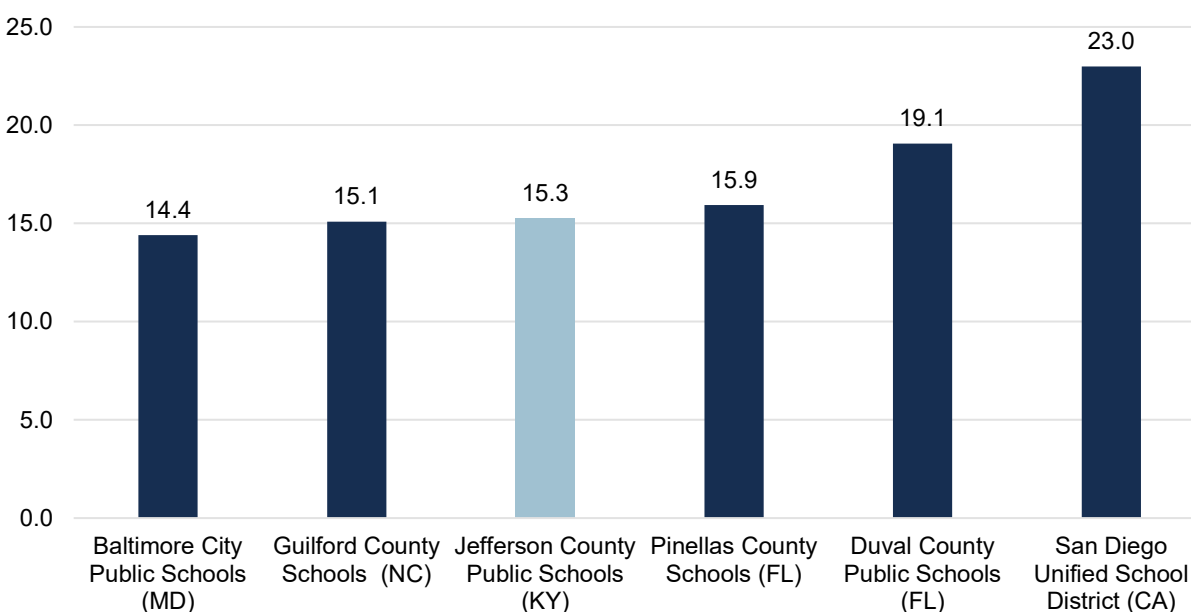
FIGURE 77: STUDENT-TO-TEACHER RATIO ACROSS FIVE HIGHEST ENROLLMENT DISTRICTS IN KENTUCKY, 2024-2025 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Figure 78 demonstrates a review of comparable school districts nationwide with similar organizational frameworks and student demographics and indicates that JCPS's student-to-teacher ratio for 2024–25 was consistent with four other districts, which ranged from 14:4 to 15.9. When accounting for variations in state statutory requirements regarding student-to-teacher ratios, San Diego Unified School District and Duval County Public Schools reported higher ratios of 23.0 and 19.1, respectively. Overall, it appears the District's average student-to-teacher ratio is aligned with state and national comparisons.

FIGURE 78: STUDENT-TO-TEACHER RATIOS BY PEER DISTRICT, 2024-25 SCHOOL YEAR



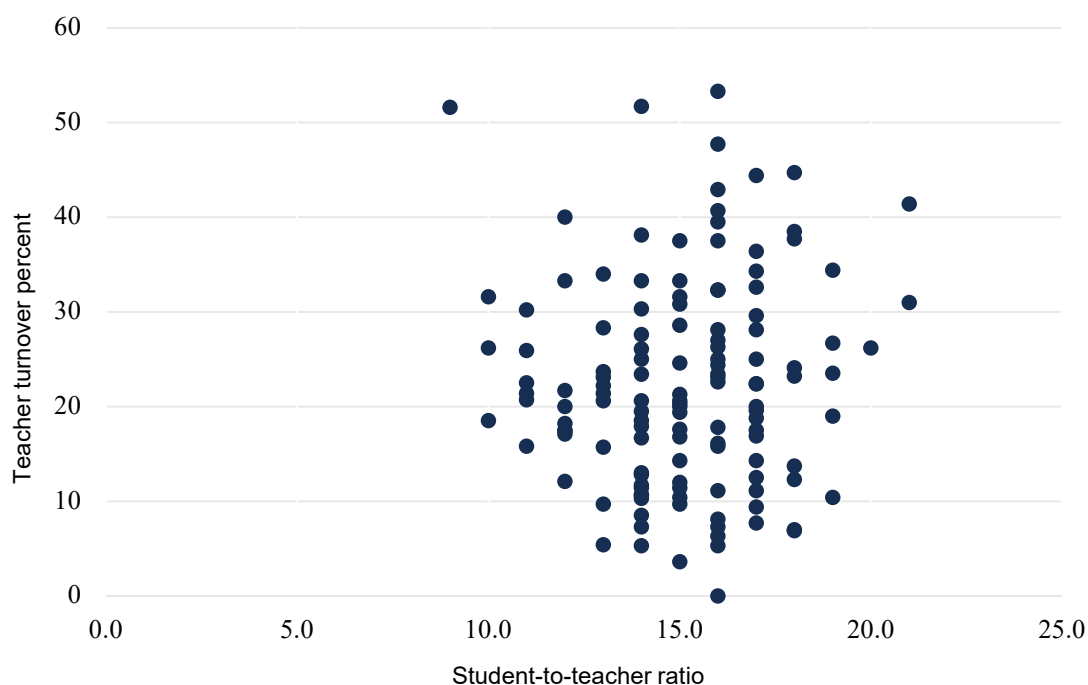
Source: National Center for Education Statistics website.

Note: Student-to-teacher ratio data for Metropolitan Nashville Public Schools is unavailable for the 2024-25 school year and is not included in the figure.

Figure 79 shows the relationship between reported student-to-teacher ratios and teacher turnover rates in 2024-25 for the District's 132 A1 schools. KDE defines A1 school as "a school under administrative control of a principal or head teacher and eligible to establish a school-based decision-making council."²⁸⁸ Ratios for A1 schools ranged from 9:1 to 21:1, showing a wide variance in average student-to-teacher ratios at the elementary, middle, and high school levels throughout the District. Turnover rates ranged from 0% to 53% with no significant correlation identified between student-to-teacher ratios at the school level.

²⁸⁸ "School Report Card Suite Dashboards 2024-25." Kentucky Department of Education. Retrieved January 12, 2026. <https://reportcard.kyschools.us/home>

FIGURE 79: JEFFERSON COUNTY PUBLIC SCHOOLS TEACHER TURNOVER RATE VS. STUDENT-TO-TEACHER RATIO FOR A1 SCHOOLS



Source: Kentucky Department of Education Report Card Dashboard.

As highlighted in Figure 79, at the aggregate level, there is no association between student-to-teacher ratio and teacher turnover rate.

Impact of Student-Teacher Ratios on Teacher Pay

Finding	
5.8	The District does not have a standardized policy for funding stipends to teachers whose classroom enrollment exceeds the student limits set in school-based budgets.

Principals reported during focus groups and site visits that stipends are provided to teachers when class enrollment exceeds state-established maximum class-size limits. This practice is sometimes necessary due to staff shortages, facility constraints, or high student mobility. These stipends are funded from the principal's school-level general fund budget and maintaining them was cited as a challenge amid other competing priorities for those funds, with annual costs in some schools ranging from \$100,000 to \$300,000.

While 702 KAR 3:190 prescribes compliance mechanisms such as exemptions and staffing adjustments, it does not mandate additional pay to teachers in Kentucky classrooms where the number of students is over the cap. As a result, 'over-cap' or overage pay is a locally determined practice used as a temporary management strategy when enrollment increases cannot be addressed through immediate staffing changes. Importantly, the use of overcap-pay does not replace the District's obligation to comply with state class-size requirements or exemption procedures.

JCPS does not maintain a Board policy that explicitly governs or defines over-cap or overage pay. While Board policies address staffing allocations and compliance with Kentucky's statutory class-size requirements, compensation practices related to classes exceeding enrollment caps are managed through collective bargaining agreements and Board-approved salary schedules rather than through formal Board policy. Further, the JCBE-JCTA collective bargaining agreement does not explicitly define or establish over-

cap pay.²⁸⁹ Compensation associated with enrollment-related staffing pressures is addressed indirectly through extra service pay provisions, temporary stipends, and memoranda of agreement negotiated for specific circumstances or school years. These mechanisms are discretionary, time-limited, and not codified as a permanent contractual entitlement tied to exceeding class-size- caps.

Recommendation	
5.8.a	The District should study the underlying challenges and costs associated with compensating teachers for overage pay when class sizes exceed established caps and determine whether the development of a formal District policy or procedural change could improve cost efficiency and promote greater consistency in class size management.

Teacher Salaries

Finding	
5.9	Despite a 62% inflation-adjusted increase in per-student revenue from 2002 to 2022, average teacher salaries in JCPS increased by only 12%, contributing to stagnant purchasing power and salary growth that has not kept pace with the cost of living.

According to the National Education Association’s *Rankings and Estimates* report (2024–2025), Kentucky’s average teacher salary in 2023–24 was \$58,325, ranking 42nd nationally.²⁹⁰ The national average teacher salary is substantially higher at \$72,030.²⁹¹ The gap is more pronounced for starting teacher pay. Kentucky’s average starting salary is around \$40,161, placing the state 48th in the national rankings and nearly \$6,400 below the national starting average of \$46,526.²⁹² This chapter uses the terms “teacher salary” and “base salary” to refer only to teachers’ wages (excluding employer-paid benefits and other non-wage compensation).

From 2002 to 2022, JCPS experienced a significant rise in per-student revenue — with a 62% increase after adjusting for inflation.²⁹³ However, average teacher salaries in the District grew by only 12% during the same period. Within the District, these figures reflect broader statewide challenges. The District’s revenue growth has been absorbed largely by rising benefit costs and expanded staffing rather than direct increases to teacher salary. As a result, teachers in JCPS, like their counterparts across Kentucky, have experienced stagnant salary growth and diminished purchasing power, especially when accounting for inflation and rising living costs. Over the past decade, salary increases have been modest, averaging below inflation, and have not kept pace with the cost of living.

According to one widely used tool developed by MIT that explores various data points with respect to cost of living across different geographical areas, “living wage” represents the hourly income needed for individuals and families to meet basic needs without public assistance, accounting for local differences in housing, childcare, food, healthcare, transportation, and taxes. According to that same tool, “required annual income” is the annual family budget needed to cover the cost of basic needs and all typical

²⁸⁹ “[2018-2026 Agreement Between the Jefferson County Board of Education and Jefferson County Teachers Association](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/f13b55c7-13d1-49ad-a6df-e480352ad850/JCBE_JCTA_Contract.pdf?disposition=inline).” Jefferson County Board of Education. 2018. Retrieved January 12, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/f13b55c7-13d1-49ad-a6df-e480352ad850/JCBE_JCTA_Contract.pdf?disposition=inline

²⁹⁰ “[2025 Reports: Educator Pay in America](https://www.nea.org/resource-library/educator-pay-and-student-spending-how-does-your-state-rank).” National Education Association. April 29, 2025. Retrieved January 20, 2026. <https://www.nea.org/resource-library/educator-pay-and-student-spending-how-does-your-state-rank>

²⁹¹ Ibid.

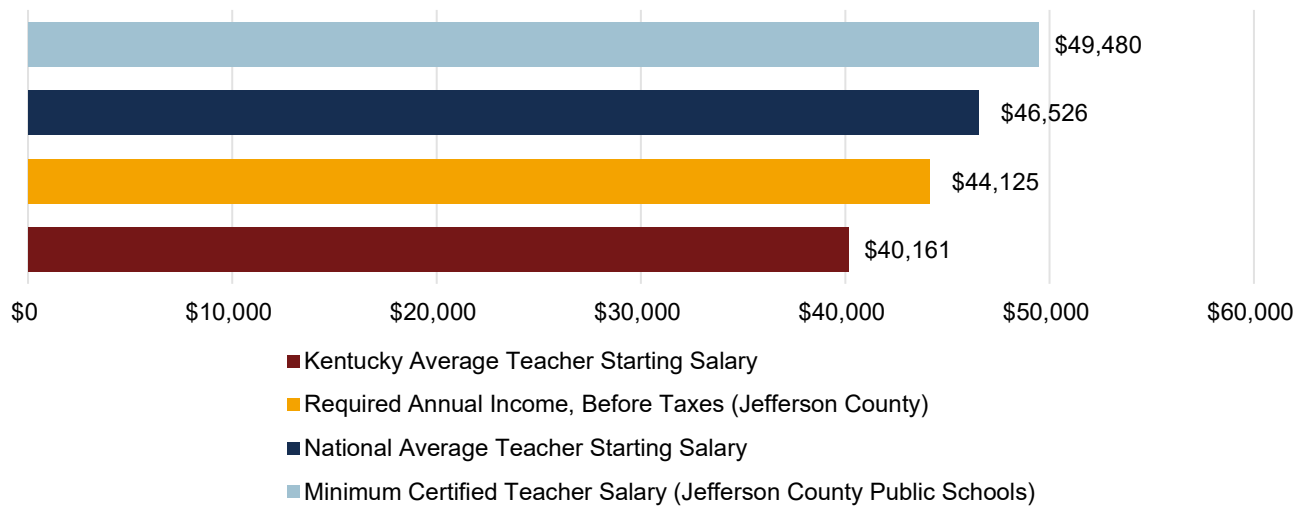
²⁹² Ibid.

²⁹³ Aldeman, C. “[Interactive: School spending is Up. Teacher Pay Isn’t. See What’s Happening in 8,900 Districts.](https://www.the74million.org/article/interactive-school-spending-is-up-teacher-pay-isnt-see-whats-happening-in-8900-districts/)” The74. May 21, 2025. Retrieved January 16, 2026. <https://www.the74million.org/article/interactive-school-spending-is-up-teacher-pay-isnt-see-whats-happening-in-8900-districts/>

expenses, excluding taxes.²⁹⁴ Both data points for Jefferson County varies depending on household composition.²⁹⁵

Figure 80 illustrates that Jefferson County's minimum salary for a certified teacher with a bachelor's degree and no prior teaching experience is slightly higher than both the national and state average starting salaries.²⁹⁶ For a single adult without children living in Louisville, KY, this starting salary exceeds the required annual income, indicating it is sufficient for one person. However, if the household includes more than one adult or any children, the JCPS starting salary no longer meets the standard for a livable income.

FIGURE 80: JEFFERSON COUNTY REQUIRED ANNUAL INCOME AND SALARIES FOR CERTIFIED TEACHERS



Sources: Jefferson County Public Schools website, National Education Association website, and MIT Living Wage calculator.
Note: Jefferson County living wage data was retrieved from MIT's Living Wage calculator for one individual with no children.

Figure 81 shows the entry-level salaries for certified teachers who hold a bachelor's degree and have no prior teaching experience. In JCPS and five out of six comparable districts, these salaries for a single adult without children are higher than the locally required annual income.

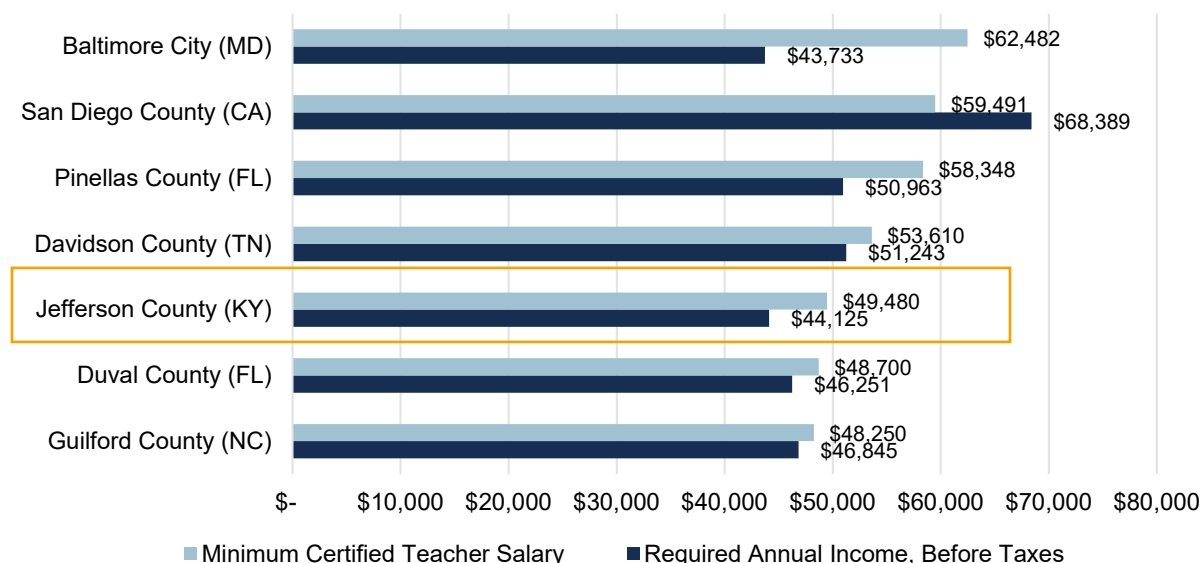
San Diego Unified School District is the only district where starting pay falls below the income threshold.

²⁹⁴ "What is a living wage and how is it estimated?" Massachusetts Institute of Technology. Published February 15, 2026. Retrieved May 8, 2026. <https://livingwage.mit.edu/pages/methodology>

²⁹⁵ "Living Wage Calculation for Jefferson County, Kentucky." Living Wage. Published February 15, 2026. Retrieved April 20, 2026. <https://livingwage.mit.edu/counties/21111>

²⁹⁶ "Job Family III Salary Schedule 2025-26." Jefferson County Public Schools. Retrieved January 9, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d8041dc9-48ee-4e20-8862-82a806f815d1/Teacher_Salary_Schedule_Job_Family_III.pdf?disposition=inline

FIGURE 81: MINIMUM SALARY FOR CERTIFIED TEACHERS AND REQUIRED ANNUAL INCOME, BEFORE TAXES ACROSS PEER DISTRICTS



Sources: District teacher salary schedules for 2025-2026 school year and MIT's Living Wage calculator.

Note: The teacher salary schedule for 2025-2026 was not available for Duval County. Data above reflect the 2024-2025 teacher salary schedule for Duval County. The data included above is calculated for one individual with no children.

Many teachers across the United States find themselves depending on supplemental income simply to cover their essential expenses, a reality driven by salaries that often fall short of meeting basic living needs. NEA's 2025 Educator Pay Data reporting calculates that the teacher pay gap is 69 cents on the dollar compared to other college-educated professionals with similar experience.²⁹⁷ In the 2023 State of the American Teacher Survey, only 34% of teachers reported they feel adequately paid and that they work an average of 53 hours per week.²⁹⁸ This challenge has become more acute as the cost of living rises and real wages for educators fail to keep pace with inflation. The most recent available data from the National Center for Education Statistics (NCES) show that in 2020-21, approximately 16% of full-time public elementary and secondary teachers worked a non-school job during the summer months and 17% did so during the school year.²⁹⁹ A study from the Economic Policy Institute identified that as many as 59% of employed teachers, especially younger educators working in high-poverty schools, participate in some form of paid supplemental work within or outside the school district.³⁰⁰

²⁹⁷ "Job Family III Salary Schedule 2025-26." Jefferson County Public Schools. Retrieved January 9, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d8041dc9-48ee-4e20-8862-82a806f815d1/Teacher_Salary_Schedule_Job_Family_III.pdf?disposition=inline.

²⁹⁸ "All Work and No Pay – Teachers' Perceptions of Their Pay and Hours Worked: Findings from the 2023 State of the American Teacher Survey." RAND Corporation. 2023. Retrieved January 21, 2026.

https://www.rand.org/content/dam/rand/pubs/research_reports/RRA1100/RRA1108-9/RAND_RRA1108-9.pdf

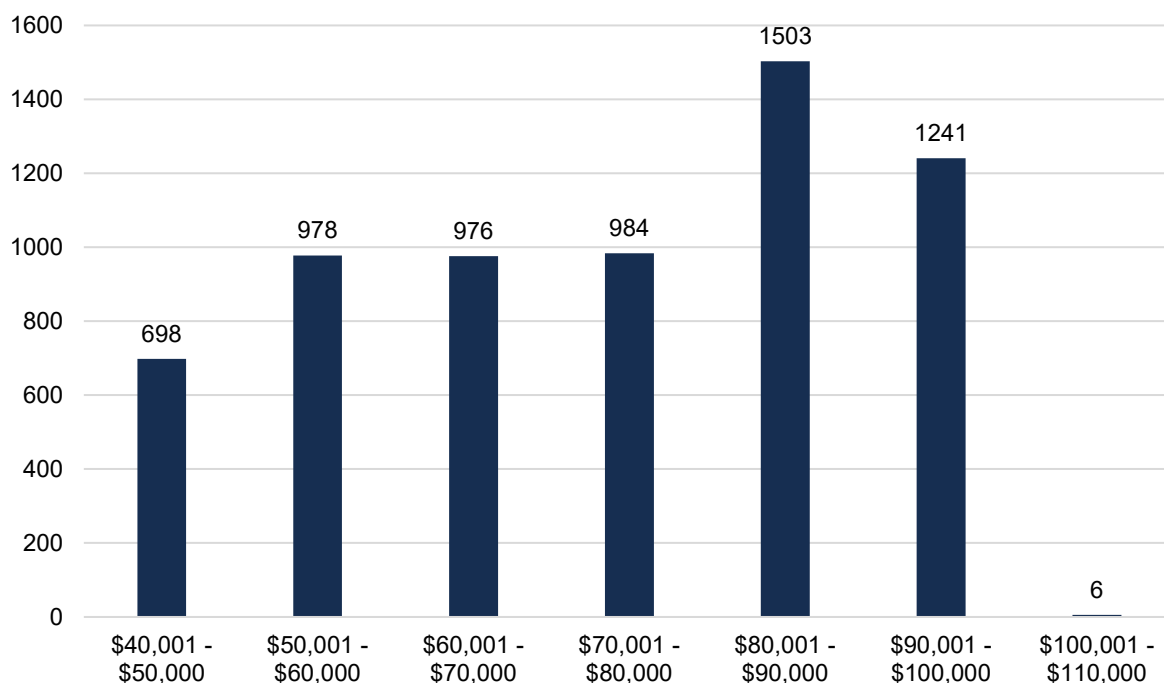
²⁹⁹ Hatfield, J. "About 1 in 6 U.S. Teachers Work Second Jobs." July 23, 2025. Retrieved January 20, 2026.

<https://www.pewresearch.org/short-reads/2025/07/23/about-1-in-6-us-teachers-work-second-jobs/>

³⁰⁰ Garcia, E., & Weiss, E. "Low Relative Pay and High Incidence of Moonlighting Play a Role in the Teacher Shortage, Particularly in High-Poverty Schools." May 9, 2019. Retrieved January 21, 2026.

<https://www.epi.org/publication/low-relative-pay-and-high-incidence-of-moonlighting-play-a-role-in-the-teacher-shortage-particularly-in-high-poverty-schools-the-third-report-in-the-perfect-storm-in-the-teacher-labor-marke/>

FIGURE 82: DISTRIBUTION OF JEFFERSON COUNTY PUBLIC SCHOOLS FULL-TIME TEACHER BASE SALARY DISTRIBUTION, FEBRUARY 3, 2025



Source: Data provided by Jefferson County Public Schools.

Note: Part-time and auxiliary teachers were excluded from this analysis. The one full-time teacher with a salary below \$40,001 was also excluded from this analysis.

Figure 82 includes an analysis of the District's reported base salary distribution for 6,386 full-time employed teachers as of February 3, 2025.

- 26% of full-time teachers (1,676) have a base salary of \$60,000 or less and may be more likely to follow national trends in supplementing their income.
- 54% of full-time teachers (3,463) employed in the District have a base salary between \$60,001 and \$90,000.
- 20% of full-time teachers (1,247) have a base salary between \$90,001 and \$110,000.

The District has made efforts to provide additional salary increases to the teaching staff in recent years and reduce out-of-pocket costs. In June of 2024, the Board and JCTA signed a memorandum of understanding (MOU) which included a 2% guaranteed pay increase during the 2024-25 school year and a guaranteed pay increase of 3% in the 2025-26 school year.³⁰¹ District Finance administrators noted to the Board at the September 16, 2025 Regular Work Session meeting that for every percent increase of Cost of Living Adjustments (COLA), the District incurs \$10 million in additional expenses.³⁰² Additional information on the District's finances can be found in Chapter 6A. Finance. During interviews, principals reported that teachers are not required to make out-of-pocket purchases for required job-related expenses. Schools have budgets

³⁰¹ "[Memoranda of Understanding Between the Jefferson County Board of Education and Jefferson County Teachers Association](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d82b8e80-8ba0-495d-9af0-b4b57d3422dd/JCBE-JCTA_CBA_Agreed_Changes_from_Wage_Opene.pdf?disposition=inline)." Jefferson County Public Schools. June 2024. Retrieved January 21, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d82b8e80-8ba0-495d-9af0-b4b57d3422dd/JCBE-JCTA_CBA_Agreed_Changes_from_Wage_Opene.pdf?disposition=inline

³⁰² "[JCBE Meeting – September 16, 2025](https://www.youtube.com/watch?v=UEPb4x63Was)." Jefferson County Board of Education. September 16, 2025. Retrieved January 21, 2026. <https://www.youtube.com/watch?v=UEPb4x63Was>

for teachers to request materials needed to perform their jobs; however, many teachers opt to purchase items for classrooms that are not required for their roles.

Recommendation	
5.9.a	The District should conduct a comprehensive teacher salary analysis and implement targeted increases to starting teacher salaries to ensure they remain competitive with state and national benchmarks.

SCHOOL ADMINISTRATOR RATIOS AND COMPENSATION

Observation	
5.10	JCPS has the highest ratio of school administrators per student among districts with similar student enrollment numbers.

School administrator ratios and compensation are central to understanding the District's capacity to foster effective school leadership and ensure operational stability. School administrators, primarily principals and assistant principals, are responsible for leading and managing the school's operations and instructional program.³⁰³ This section explores how student-to-school administrator ratios and base pay structures influence school management, support for teachers, and student outcomes. By examining quantitative data alongside the wider context of state requirements and District efforts, the following section provides a comprehensive perspective on how these factors affect educational quality, resource allocation, and long-term planning for school improvement.

Kentucky law does not establish or require student-to-school administrator ratios in the same way 702 KAR 3:190 identifies maximum limits for student-to-teacher ratios. Decisions regarding administrative staffing levels for principals, assistant principals, and other school administrators are made locally by boards of education based on district priorities, organizational structures, and budgetary considerations rather than state mandate.

There is no nationally mandated student-to-administrator ratio, and professional organizations do not prescribe a single best-practice standard. Research from the Wallace Foundation emphasizes that effective school leadership depends less on fixed student-to-administrator ratios and more on intentionally structuring leadership roles and supports to reflect school size, student needs, and organizational complexity, enabling principals to focus on instructional leadership rather than operational demands.³⁰⁴

NCES uses annual, standardized staff and enrollment data reported by states through the Common Core of Data to calculate how many students each school administrator or administrative support staff member serves, providing a high-level picture of school staffing patterns nationwide.³⁰⁵ National data from NCES show that U.S. public schools average roughly one school-level administrator for every 180–200 students, with substantial variation by school size, grade span, and student need.³⁰⁶ The following Figure 83 compares Jefferson County's student-to-school administrator ratio of 137.5:1. This means that there is approximately one school-based administrator for every 138 students. Jefferson County has a lower

³⁰³ "CCD School and District Glossary." National Center for Education Statistics. 2026. Retrieved February 26, 2026. <https://nces.ed.gov/ccd/commonfiles/glossary.asp>

³⁰⁴ "Building Principal Pipelines: A Job That Urban Districts Can Do." The Wallace Foundation. June 2017. Retrieved February 26, 2026. <https://eed.communities.ed.gov/sites/default/files/2024-07/Building%20Principal%20Pipelines.pdf>

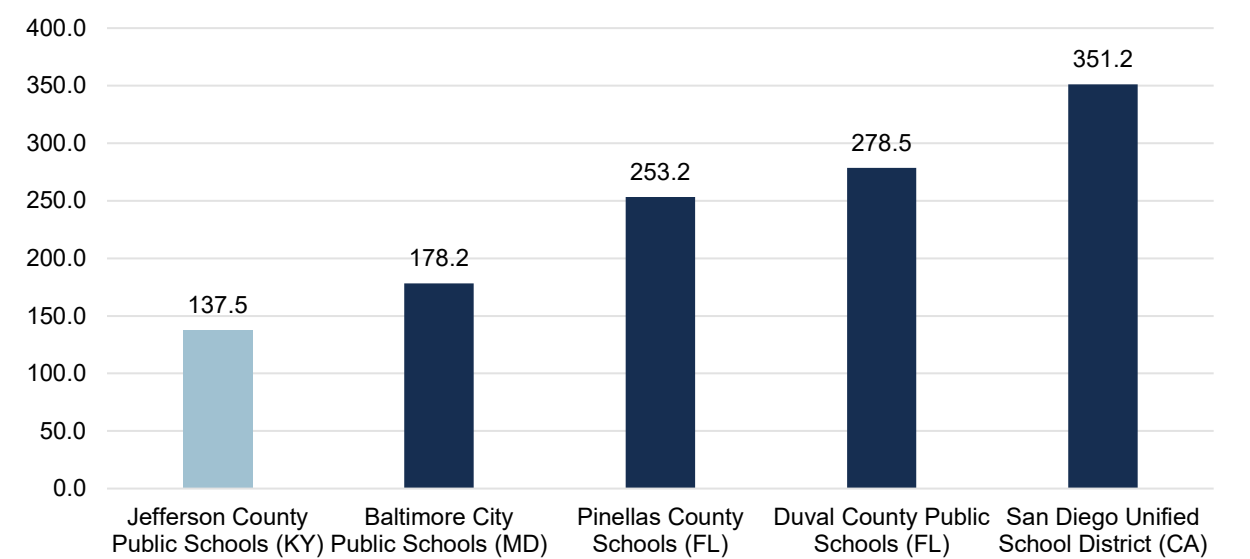
³⁰⁵ "Common Core of Data." Institute of Education Sciences. 2026. Retrieved February 26, 2026.

<https://nces.ed.gov/ccd/>

³⁰⁶ "Staff Employed and Pupil/Staff Ratios in Public Elementary and Secondary School Systems, by Type of Assignment and Locale: Fall 2021." National Center for Education Statistics. April 2023. Retrieved February 26, 2026. https://nces.ed.gov/programs/digest/d22/tables/dt22_213.60.asp

student-to-school administrator than all its peer districts, suggesting that, on average, school administrators are responsible for fewer students than in comparison districts.

FIGURE 83: STUDENT-TO-SCHOOL ADMINISTRATOR RATIO (NOT INCLUDING SUPPORT STAFF) BY COMPARISON DISTRICT, 2024-25 SCHOOL YEAR



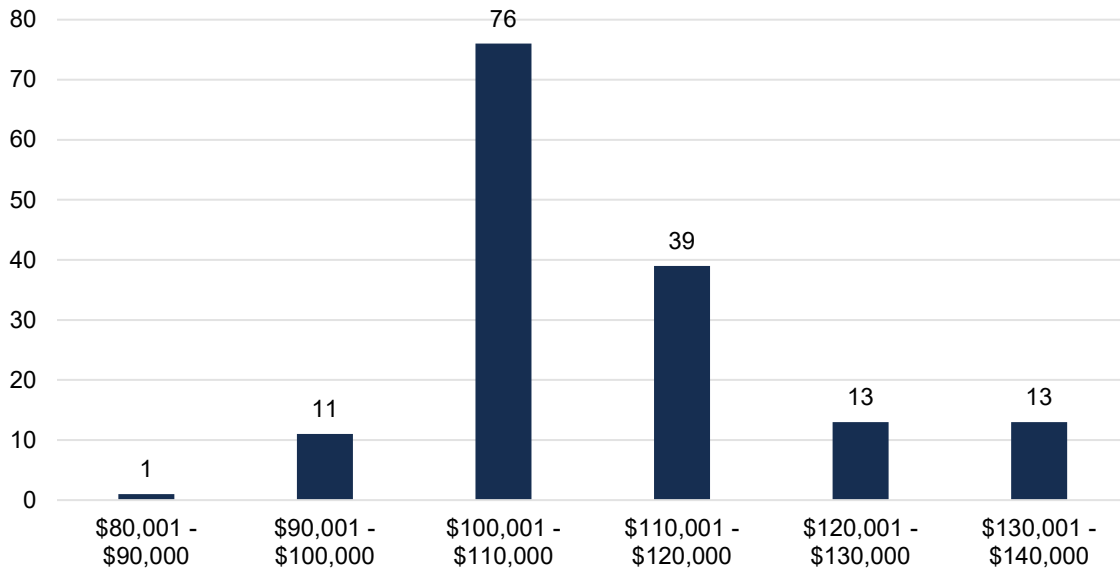
Source: National Center for Education Statistics website.
Note: Student-to-school administrator data for Guilford County Public Schools and Metropolitan Nashville Public Schools are unavailable for the 2024-25 school year and are not included in the figure.

JCPS assigns more school administrators per student than other districts. However, lower student-to-administrator ratios alone are not proven to improve school outcomes. Key factors are clear leadership roles, effective delegation, and organizational consistency. Without evidence linking higher staffing to better results, it's unclear if JCPS's model is delivering value. While JCPS's low student-to-administrator ratios reflect significant investment in leadership, these figures don't show how the investment is organized or funded. This prompts the District to consider whether current administrator levels and structures meet school needs or if resources should be reallocated.

Administrator salaries help evaluate whether pay matches staffing structure and organizational goals. The District's comparatively low student-to-school administrator ratios indicate a substantial investment in school-level leadership capacity. To better understand the financial structure of this investment, the following section reviews base salaries for principals and assistant principals as reported in District salary data. Base salary is used for comparative analysis because it provides a consistent measure across roles and avoids variability introduced by stipends, supplemental duties, or other forms of total compensation that may differ by assignment or school context.

As highlighted in Figure 84, an analysis of the base salary distribution for 153 principals shows a concentration of principal base salaries between \$100,000 and \$120,000 annually. The average base salary across principals as of February 2025 was \$111,598.98.

FIGURE 84: DISTRIBUTION OF JEFFERSON COUNTY PUBLIC SCHOOLS PRINCIPAL BASE SALARIES, FEBRUARY 2025

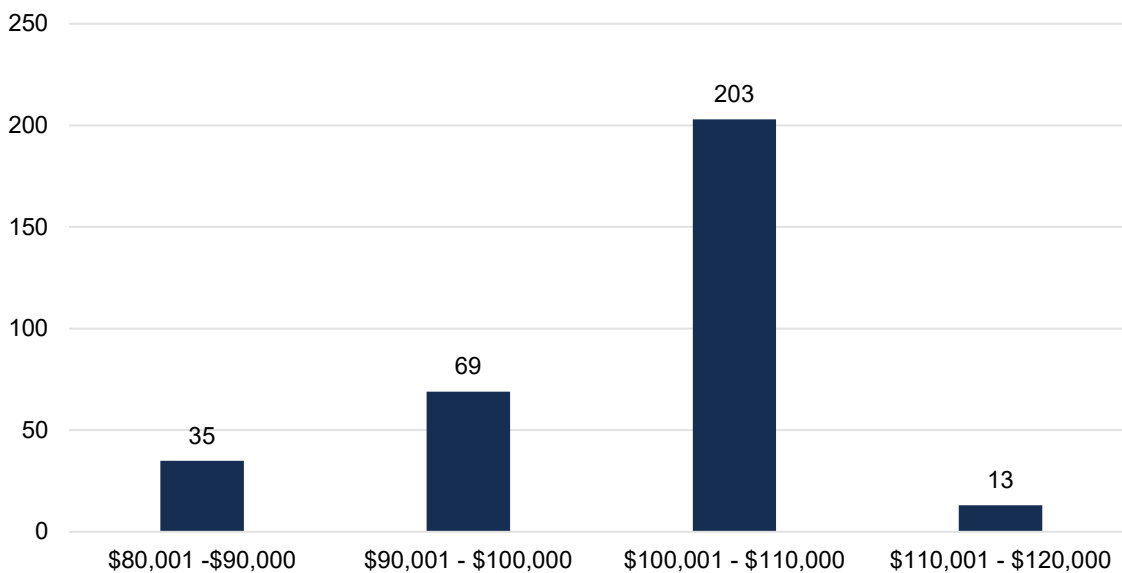


Source: Data provided by Jefferson County Public Schools.

Note: Base salaries above do not include AIS or Choice Zone stipends.

As illustrated in Figure 85, most assistant principals in the District earned a base salary between \$100,001 and \$110,000. The average base salary across assistant principals as of February 2025 was \$101,236.02.

FIGURE 85: DISTRIBUTION OF JEFFERSON COUNTY PUBLIC SCHOOLS ASSISTANT PRINCIPAL BASE SALARIES, FEBRUARY 2025



Source: Data provided by Jefferson County Public Schools.

Note: Base salaries above do not include AIS or Choice Zone stipends.

The U.S. Bureau of Labor Statistics reported the national median annual wage for K-12 school principals was \$113,420 as of May 2024.³⁰⁷ This figure represents a midpoint in the salary range, with the lowest 10 percent of principals earning less than \$72,400 and the highest 10% earning more than \$165,000 annually. The state median annual wage for K-12 school principals in this same report was \$95,470, approximately \$17,950 below the national average.³⁰⁸

When comparing the average base salaries for principals and assistant principals in JCPS as of 2024-25 to national averages in 2024, respectively, the District’s compensation levels exceed national averages for both roles. This investment in school-based leadership capacity suggests that JCPS’s principal and assistant principal base salary is competitive and may help attract and retain qualified leaders, though continued review is warranted to ensure alignment with the District’s organizational goals, staffing model and student needs.

Recommendation	
5.10.a	The District should review administrator staffing ratios and base salaries to ensure they match student needs, school size, and organizational complexity, using state and national benchmarks for comparison. Targeted adjustments may be necessary to improve school outcomes and financial sustainability based on assessment results.

³⁰⁷ “[Occupational Employment and Wage Statistics \(OWES\) Profiles](#).” US Bureau of Labor Statistics. May 2024. Retrieved March 11, 2026. <https://data.bls.gov/oesprofile/>

³⁰⁸ Ibid.

CHAPTER 6: OPERATIONS AND TECHNOLOGY

OPERATIONS DIVISION OVERVIEW

Structure and Staffing

Observation	
6.1	The reporting relationship between the Executive Director for Facility Maintenance, Renovations, and Property Management Services and the Executive Director for Operations Services differs in practice from what is written in the organizational chart.

The Operations Division employs 1,665 staff and ensures that JCPS operates smoothly and safely for students and staff.³⁰⁹ As shown in Figure 86, the Chief Operations Officer (COO) reports to the Superintendent. Major functions of the Operations Division are managed by executive directors or executive administrators and include:

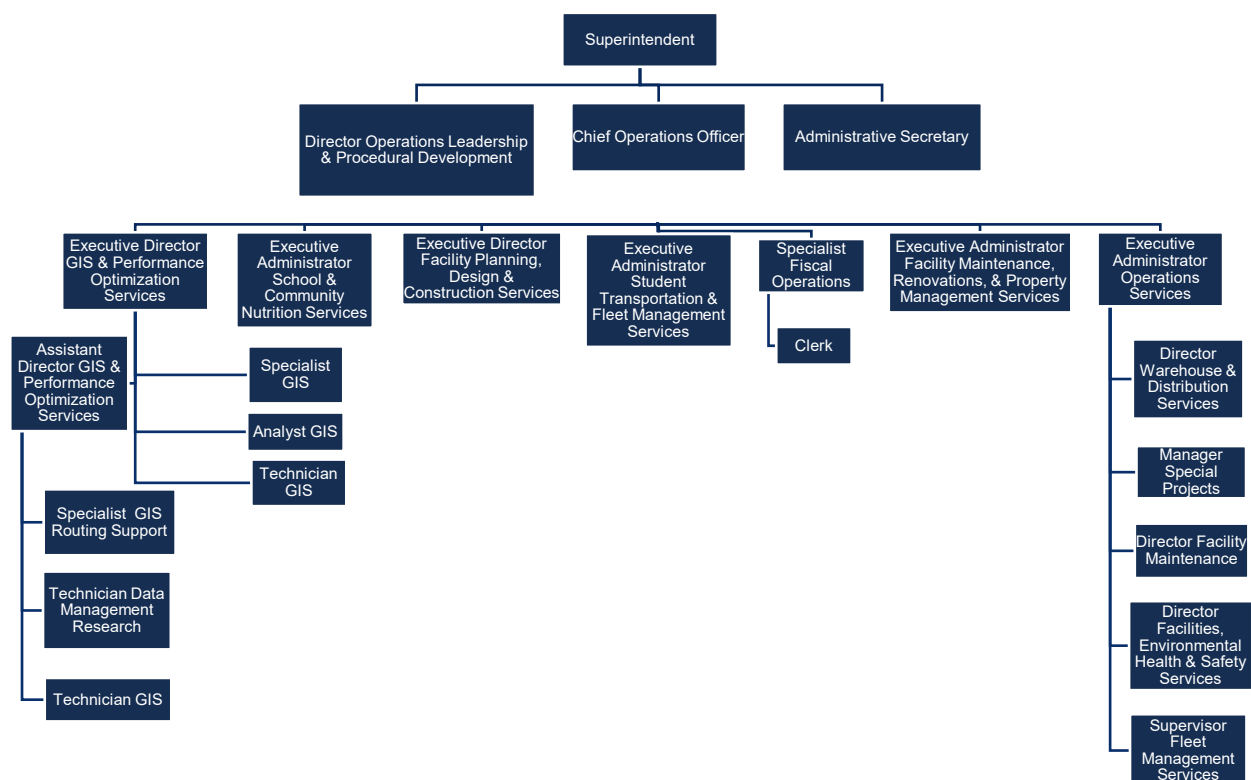
- Geographic Information Systems (GIS) and Performance Operations
- Nutrition and Food Services
- Transportation and Fleet Management
- Facility and Grounds Maintenance
- Facility Planning, Design, and Construction Services

An Executive Administrator for Operations Services oversees directors for:

- Warehouse and Distribution Services
- Special Projects
- Facility Maintenance
- Facilities, Environmental Health, and Safety Services
- Fleet Management Services

³⁰⁹ Yearwood, Brian. “[Jefferson County Public Schools: 2026 Reorganization Coherence](https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=939429).” Jefferson County Board of Education. Published February 10, 2026. Retrieved February 12, 2026.
<https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=939429>

FIGURE 86: JEFFERSON COUNTY PUBLIC SCHOOLS OPERATIONS DIVISION ORGANIZATIONAL CHART



Source: Jefferson County Public Schools Human Resources Central Office Organizational Charts.

Operations staff reported multiple reorganizations in the recent past in terms of reporting lines and structures. Staff reported the COO and Executive Administrator for Operations Services had split up management over the major operations functions — with the Executive Administrator for Operations Services serving as a day-to-day operational manager over large volumes of employees in fleet management, warehouse, facility maintenance, and environmental health and safety, and the COO providing long range planning and direct oversight over GIS, facility planning and construction, and nutrition. Staff did not report any negative feedback associated with the organizational structure; however, the organizational chart lacked clarity in a few ways:

- In focus groups, staff clarified that in practice, the Executive Administrator of Facility Maintenance, Renovations, and Property Management Services reports to the Executive Administrator for Operations Services; this is unclear in the organizational chart which shows an indirect report between the roles, and the roles appear (as peers) on the same level.
- Roles related to specific functions appear in multiple verticals of the organizational chart. For example, the Supervisor of Fleet Management Services does not report to the Executive Administrator for Student Transportation and Fleet Management Services.

Based on staff interviews, the reporting lines and their evolution over time appeared to be partially related to balancing the number of direct reports across leaders due to the large volume of staff that work in Operations.

Based on the proposed organizational structure changes for the 2026-27 school year, the executive administrators reporting to the COO were changed to executive director roles and the Manager of Fleet Management Services was retitled to the Manager of Fleet Maintenance Services. The title change for Manager of Fleet Maintenance Services may indicate a distinction between fleet management and fleet

maintenance functions, which are organized on separate verticals on the organizational chart. The proposed updated organizational charts did not include any changes to the indirect reporting relationship between the Executive Director of Facility Maintenance, Renovations, and Property Management Services and the Executive Director of Operations Services — a clarification that may be helpful to staff.

Recommendation	
6.1.a	The JCPS Operations Division should clarify the reporting relationship between the Executive Director for Facility Maintenance, Renovations, and Property Management Services and the Executive Director for Operations Services.

Vacancy and Compensation Issues

According to Operations leaders, significant vacancies exist in maintenance and skilled trades roles, which impacts the efficiency and quality of services provided to the District. In focus groups and in survey comments, staff shared that recruiting and retaining employees in skilled trades such as electricians, plumbers, and maintenance workers has proven difficult for JCPS. Operations leaders attribute recruitment and retention issues to compensation, citing difficulties in providing competitive market pay for people in skilled trades. Reportedly, many retired individuals have come to work in skilled areas for JCPS, rather than a pipeline of early/mid-career or even late-career experienced individuals. Focus group participants also noted difficulties in fulfilling maintenance requests due to vacancies in skilled trades roles.

This issue is being partially addressed by leveraging partnerships within the multilingual community in Louisville as a recruitment strategy for roles in facilities, environmental health, and safety services.

Disparities in JCPS pay across operations roles have created imbalances, as reported by staff. For example, Operations leaders reported that JCPS implemented a stipend for bus drivers and bus mechanics to help fill some positions and maintain the existing workforce. When that occurred, skilled maintenance staff perceived an imbalance in pay across roles and reportedly expressed interest in giving up their trade (such as carpentry) to become a bus driver because it would pay more.

In the exam survey, 56% of Operations staff respondents agreed that morale is high in their work environment, compared to a 67% rate of agreement across all Central Office staff respondents.

The exam team collected only perception data on these vacancy and compensation challenges. A comprehensive compensation study and vacancy rates analysis for operations staff may be an area for future study by the District.

FACILITIES

Facilities Staffing

The COO oversees the following senior leaders managing facilities teams:³¹⁰

- Executive Director Facility Planning, Design, and Construction Services
- Executive Administrator Facility Maintenance, Renovations, and Property Management Services
- Executive Administrator Operations Services

The facility planning, design, and construction team manages new builds and renovations and includes architects, engineers, and project coordinators. The maintenance, renovation, and property management services team is responsible for general facility maintenance and renovations that do not require external architects or engineers. Staff include grounds specialists, renovation coordinators, and maintenance specialists. The Executive Administrator of Operations Services oversees facility management services, environmental health and safety services, warehouse distribution services, and fleet management.

³¹⁰ “Org Chart-Board Approved October 14, 2025.” Jefferson County Public Schools. October 2025. [PDF].

Facilities Planning

Observation	
6.2	JCPS's facility plan documents are not clearly aligned.

As shown in Figure 87, JCPS uses three key documents to outline facility plans — the District Facility Plan (DFP), the Facility Profile Index Report (FPI), and the Comprehensive District Improvement Plan (CDIP). This section draws from these documents to describe the current state of JCPS facilities.

FIGURE 87: JEFFERSON COUNTY PUBLIC SCHOOLS FACILITY PLAN DOCUMENTS

DOCUMENT	Date Published	Purpose	Requirements
Facility Profile Index Report (FPI) ³¹¹	Introduced for the first time in November 2025	Combines three critical indicators to create a metric to identify and prioritize facility improvements	None, created by JCPS
District Facility Plan (DFP) ³¹²	May 2022 (next report due May 2026)	Reports student enrollment and building capacity and outlines facility plans for the next 4 years	Required to be created and shared every 4 years with the Kentucky Department of Education (KDE)
Comprehensive District Improvement Plan (CDIP) ³¹³	2025-26	Outlines goals, objectives, and strategies across key areas in JCPS, including facilities	Required by the Every Student Succeeds Act (ESSA)

There does not appear to be strong alignment between the FPI, DFP, and CDIP. This lack of alignment may be due to the purpose and timing of when each of these documents were developed. The format and components of the DFP are required by KDE, whereas the CDIP is a more comprehensive document outlining District strategy across all areas, including Facilities, and is required by the Commonwealth under ESSA. As the primary documents outlining facilities-related metrics and plans, there is opportunity for greater connection and alignment between the FPI and the DFP.

Recommendation	
6.2.a	The JCPS Facilities Profile Index (FPI) should explicitly connect with the District Facility Plan (DFP) and Comprehensive District Improvement Plan (CDIP), using common metrics, definitions, and aligned facilities improvement plans for clarity and transparency.

³¹¹ "JCPS Operations Annual Report Facility Profile Index". Jefferson County Public Schools. Published Fall 2025.

Retrieved November, 21, 2025. https://drive.google.com/file/d/1WtkjnF8T9I_iRvQXXayGxTriFWphl4y/view

³¹² "Jefferson County Schools District Facility Plan". Jefferson County Public Schools. Published May 2022. Retrieved December 1, 2025. <https://www.education.ky.gov/districts/fac/documents/jefferson%20co%20dfp.pdf>

³¹³ "Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-26." Jefferson County Public Schools. Retrieved March 23, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hI-ZaNX-dx5N9QfuM7/view>

Facility Profile Index and Capital Investment Decision-Making

Observation

- 6.3** The 2025 Facility Profile Index provides data related to future investment decisions, increasing public transparency. Prior to 2025, it is unclear to the public and to the exam team what data were used to inform capital planning and how decisions were made regarding capital resource allocations.

JCPS introduced the FPI for the first time in fall 2025 to identify priority schools for capital improvements.³¹⁴ The District stated the FPI will be recalculated annually with an updated report presented each year. The FPI represented a new approach by aggregating previously separated data points into one metric to guide decision-making. The index was based on three “Critical Categories”:

- Facility Condition Index: Ratio of the total cost to fully replace a facility to the projected cost to replace the current gross square footage.
- Operating Cost per Student: Total yearly school expenses divided by number of students.
- Enrollment: Comparison of current and optimal student capacity using JCPS GIS data and average enrollment growth rate. According to the FPI report, optimal enrollment for the 2023-24 school year was defined as operating between 75% and 115% of building capacity.

The FPI combined standardized scores from these three categories to create a composite measure for each school. Schools ranking in the bottom fifteen of any category were identified as “needing attention in critical categories.” To ensure recent investments were considered, schools that underwent significant renovation or construction within the last four years were excluded from the FPI analysis. For those identified as needing attention across the three critical categories, JCPS conducted an enrollment and capacity analysis to assess whether facility challenges were concentrated in specific regions or whether school consolidations may be viable. Based on this review, JCPS Operations developed recommendations for each school, such as invest/rebuild, repurpose, consolidate, further study, or close/divest. As the last step in the process, the FPI stated the Board of Education will review recommendations and discuss next steps.

Based on the findings of the FPI Report, in November 2025, Superintendent Yearwood announced recommended facility changes for the 2026-27 school year.³¹⁵ He proposed closures, consolidations, facility upgrades, or boundary changes affecting ten schools. These proposed actions marked a substantial shift in school facilities priorities from previous years. In 2023, Superintendent Pollio stated the District could afford to spend \$150 to \$180 million annually over the next four years on renovations and new buildings, along with \$5 million on athletic facilities.³¹⁶ Nine schools were slated for new constructions between 2022 and 2026, while eight schools were scheduled for renovations. These plans expanded on the previous District Facilities Plan from 2018-22, which identified four schools for new construction and nine for renovations.

The schools affected by Superintendent Yearwood’s proposal did not overlap with those in Superintendent Pollio’s construction plan, some of which were already complete. Superintendent Yearwood presented the consolidation and closure recommendations outlined in the FPI report at the December 9, 2025 Jefferson County Board of Education meeting. Following community pushback and three public input sessions, the Board voted to pause on the motion, requesting the District dedicate additional time to present thorough

³¹⁴ “[JCPS Operations Annual Report Facility Profile Index](#)”. Jefferson County Public Schools. Published Fall 2025. Retrieved November, 21, 2025. https://drive.google.com/file/d/1WtkjnF8T9I_iRvQXXayGxTriFWphI4y/view

³¹⁵ “[JCPS Proposes Facility Changes for 2026-27: A Two-Part Strategy Addressing Efficiency and Program Needs.](#)” Jefferson County Public Schools. Published November 20, 2025. Retrieved November 24, 2025. <https://www.jefferson.kyschools.us/article/2561308>

³¹⁶ “[JCPS Hoping to Build 23 New Schools in 10 Years.](#)” Jefferson County Public Schools. Published February 8, 2023. Retrieved November 24, 2025. <https://www.jefferson.kyschools.us/article/1638885>

justifications (including the academic, fiscal, and logistical benefits) for each recommended change.³¹⁷ Ultimately, the Board voted at their January 20, 2026 meeting to close two elementary schools and relocate one high school. The FPI reflected data and recommendations from the Operations Division regarding the closure of the two elementary schools, but did not provide any recommendation regarding the relocation of the high school, which was not included in the list of schools classified in FPI critical categories.

Participants in interviews and focus groups discussed JCPS's facility plans from the previous years and their challenges. Central Office staff noted the previous facility plans were ambitious and require significant financial resources and political will. Some stakeholders perceived that JCPS prioritizes facility upgrades at particular schools without providing a transparent explanation for those decisions. Participants stressed systemic improvements across all JCPS schools should remain central to future planning.

There was also a perception among focus group participants that facility upgrades and new builds are prioritized in more affluent areas, while schools in disadvantaged areas had inadequate facilities. Despite community perceptions that new schools were prioritized in affluent areas, the exam team's analysis found no strong link between new construction and higher neighborhood income, based on the schools included in the 2018–22 and 2022–26 facility plans outlined by Superintendent Pollio.³¹⁸

- The new constructions built in 2018–22 were located in zip codes with an average median household income of \$65,785, with incomes ranging from \$31,377 to \$111,250.
- The 2022–26 projects were located in neighborhoods with comparably lower median incomes with an average of \$56,530 and a lower range of \$47,575 to \$73,549.
- Compared to the District median of \$66,184, the earlier projects were more often in zip codes with comparable income to the District median, while the newer projects tended to be in zip codes with slightly lower incomes.³¹⁹

While this is not a strong pattern, it indicates that the newer plan included more schools in moderate-to lower-income areas than the previous one.

The FPI further complicated this perception because it excluded schools that have recently undergone significant renovations, making it difficult for the community to see where investments have already occurred. Taken together, the limited visibility of past investments, the modest income differences in locations for recent construction plans, and the community's ongoing perceptions suggest a disconnect between where facilities are being built and how those decisions are understood, highlighting the need for clearer communication regarding facilities investments.

Recommendations	
6.3.a	JCPS should include information on recently completed and ongoing capital improvement projects by school and zip code in the annual Facilities Profiles Index (FPI) report for context, so public perception is not inaccurately skewed, and to further strengthen accountability to stakeholders regarding facilities decision-making.
6.3.b	JCPS should ensure capital improvement plans and decisions regarding school closures, consolidations, and relocations align with the published data and recommendations in the FPI report.

³¹⁷ “[Jefferson County Board of Education Leaders Call for Pause on School Closure and Consolidation Plan.](#)”

Jefferson County Public Schools. Published December 5, 2025. Retrieved January 30, 2026.

<https://www.jefferson.kyschools.us/article/2583609>

³¹⁸ “[JCPS Hoping to Build 23 New Schools in 10 Years.](#)” Jefferson County Public Schools. Published February 8, 2023. Retrieved November 24, 2025. <https://www.jefferson.kyschools.us/article/1638885>

³¹⁹ “[ACS-ED District Demographic Dashboard 2018-22.](#)” National Center for Education Statistics. Retrieved February 3, 2026. <https://nces.ed.gov/Programs/Edge/ACSDashboard/2102990>

Deferred Maintenance

Observation	
6.4	JCPS lacks a transparent deferred-maintenance master plan to manage the backlog of maintenance needs postponed due to budget constraints.

Deferred maintenance — that is, postponed maintenance due to budget constraints — is a component of capital planning. While funding amounts for each project are publicly reported in Board meeting minutes at three key approval stages (prior to design, after bidding, and at project closeout), it remains unclear how JCPS tracks, documents, and estimates its deferred maintenance needs, or the extent to which that information is incorporated into the FPI and broader capital planning process. In focus groups, staff reported JCPS did not have a master deferred maintenance plan, nor could the exam team find one on the JCPS website. School districts often have deferred maintenance plans (which can be a component of a master facilities or capital plan) that detail the specific facilities projects by building, priority level, and cost for things that are backlogged due to budget constraints (like roofs, HVAC, and plumbing).

Despite this lack of publicly available detailed documentation, JCPS has reported that rising costs for deferred or delayed maintenance is an issue. According to reporting of a JCPS Operations leadership presentation at an October 2025 JCPS Revenue Advisory Task Force meeting, deferred maintenance repairs delayed due to budget constraints now totals an estimated \$2.5 billion when including ADA compliant playgrounds and athletics.³²⁰ Focus group participants also discussed needs for funding and long-term planning to ensure new school buildings and renovations keep pace with degradation in other buildings.

Recommendation	
6.4.a	JCPS should develop a master deferred maintenance plan that prioritizes transparency in repairs, estimated costs, and funding strategy.

District Facilities Plan

702 KAR 4:170 requires public school districts to follow minimum standards for classroom size and school facility design.³²¹ The regulation, via the incorporated “Facility Programming and Construction Criteria Planning Guide” (the Guide), outlines standard classroom sizes for preschool, elementary school, middle school, and high school as well as specialty spaces like resources rooms and classrooms for students with disabilities. The Guide also sets facility guidelines, including requirements for how much of a building must be dedicated to program space, minimum corridor widths for different school levels, and standards for the size of renovated instructional spaces.

702 KAR 4:180 outlines the process for facilities planning and funding by districts via the standards and procedures outlined in the “Kentucky School Facilities Planning Manual.”³²² In accordance with the regulation, districts must create a District Facilities Plan (DFP) every four years that identifies their building

³²⁰ Schanie, Adi. “[JCPS warns of \\$2.5 billion in maintenance needs, rising costs amid budget deficit](https://www.wdrb.com/news/education/jcps-warns-of-2-5-billion-in-maintenance-needs-rising-costs-amid-budget-deficit/article_06af114c-2dae-4a11-8a59-5307d2147d2a.html).” Published October 6, 2025. Retrieved March 23, 2026. https://www.wdrb.com/news/education/jcps-warns-of-2-5-billion-in-maintenance-needs-rising-costs-amid-budget-deficit/article_06af114c-2dae-4a11-8a59-5307d2147d2a.html

³²¹ “[702 KAR 4:170. Facility Programming and Construction Criteria Planning Guide](https://www.education.ky.gov/districts/legal/Documents/Facility%20Programming%20and%20Construction%20Criteria%20Planning%20Guide%20(1994%20Filing,%20adopted%201995).pdf).” Kentucky Department of Education. Retrieved November 24, 2025.

[https://www.education.ky.gov/districts/legal/Documents/Facility%20Programming%20and%20Construction%20Criteria%20Planning%20Guide%20\(1994%20Filing,%20adopted%201995\).pdf](https://www.education.ky.gov/districts/legal/Documents/Facility%20Programming%20and%20Construction%20Criteria%20Planning%20Guide%20(1994%20Filing,%20adopted%201995).pdf)

³²² “[The Kentucky School Facilities Planning Manual, 702 KAR 4:180](https://www.education.ky.gov/districts/fac/documents/facilities%20planning%202008.pdf).” Kentucky Board of Education. Published June 2008. Retrieved November 24, 2025.

<https://www.education.ky.gov/districts/fac/documents/facilities%20planning%202008.pdf>

needs and priorities. JCPS's last DFP was published in May 2022, with the next report expected to be released May 2026.

In the DFP, capital improvement projects are categorized into one of five priority areas:

- Priority 1: Education projects to begin within the biennium.
- Priority 2: Education projects not scheduled within the biennium.
- Priority 3: Non-educational additions or expansions, including kitchens, cafeterias, administrative areas, etc.
- Priority 4: Management support facilities, including construction, acquisition, or renovation of central offices, bus garages, or central stores.
- Priority 5: Discretionary construction projects.

Projects outlined as Priority 1 in the 2022 DFP were scheduled within the 2022-2023 biennium (state fiscal years 2022 and 2023), while projects in Priority areas 2,3,4, and 5 were scheduled for after the 2022-23 biennium.³²³

- Of the 223 projects in the 2022 DFP, 39% were considered priority one, 44% were priority two, 16% were priority three, and 1% (or two projects) were labeled as priority four. There were no projects listed as priority five.
- Across all priority areas, Johnsontown Road Elementary School had the most renovations with three projects, while 16 schools had two projects each and 51 schools had one project each.
- Construction projects spanned 28 zip codes, with the highest number of five projects each in zip codes 40211 and 40203, both on the west side of Louisville.

Projects listed in Priorities 1 to 4 of the DFP are eligible for restricted state funding through the School Facilities Construction Commission (SFCC). The SFCC allocates funds based on the District's calculated facility needs, adjusted for available local revenue, and distributes money for the remaining "Unmet Need" according to the priority order established in the DFP. The JCPS FY26 Working Budget stated the District's unmet facilities needs currently exceed \$1.3 billion. The combination of the Capital Outlay, Building, and Construction funds represents 8.2% of the total working budget.

Renovation projects must meet specific criteria to qualify for state funding, including serving a minimum number of students and not exceeding 80% of the cost of replacing the facility with new construction. Discretionary projects, which do not meet the criteria for Priorities 1 through 4, are listed as Priority 5 and may only be funded with non-restricted local resources.

The DFP and FPI differ as the DFP is published every four years as mandated by the state, while the FPI is a new JCPS report, first published in fall 2025. The DFP categorizes facilities projects into multiple priorities defined by the state, while the FPI provides a more in-depth analysis of facilities priorities based on condition index, cost, and enrollment factors. The 2026 DFP and the 2025 FPI may overlap by listing similar facilities priorities in both documents.

While the DFP represents facility actions in 2022, there were overlaps with Superintendent Yearwood's proposed changes based on the 2025 FPI. Of the 10 schools slated for closure, consolidation, facility updates, or boundary changes in the FPI, 9 were included in the 2022 DFP (Liberty High School was the exception). However, the proposed changes for each school detailed in the FPI were not necessarily the same as those documented in the DFP.

Comprehensive District Improvement Plan

The District's 2025-26 Comprehensive District Improvement Plan (CDIP) references "Financial Stability" as the strategic priority area addressed through the development of a facilities planning process. It is unclear

³²³ ["The Kentucky School Facilities Planning Manual, 702 KAR 4:180."](https://www.ky.gov/education/facilities-planning) Kentucky Board of Education. Published June 2008. Retrieved November 24, 2025.
<https://www.education.ky.gov/districts/fac/documents/facilities%20planning%202008.pdf> .

what plan document this is referring to. As part of the stated “Financial Stability” strategic priority area listed in the CDIP, the District included the development of a facilities planning process and a modernized facilities plan to address critical three-year consumer and renovations needs. This planned activity was slated for August 2025 – December 2026. The details and status of this work are unknown. The CDIP also discusses the District’s ongoing comprehensive safety review of facilities, staffing, policies, and emergency preparedness as well as the prioritization of the Enhanced Support Zone (ESZ) for District facility work. Funding needs cited include \$28.6M for building new West Louisville Elementary School, \$43M for construction of new West Louisville Middle School, and \$42M for renovations at Shawnee.

Facility Observations

The exam team conducted site visits to a sample of JCPs schools. As seen in Figure 88, the facilities at the 30 schools visited by the exam team were generally accessible, well-maintained and safe for all students, staff, and visitors. Additional details are provided below:

- In terms of safety, all schools visited were physically secured and had clearly identified exits and evacuation routes. (See School Safety section in **Chapter 8: Student Supports, Culture, & Climate** for more information).
- All schools kept their hallways and common areas clean and most maintained their exterior and interior areas.
- Most schools (83%) displayed student work, achievement, and/or community events in hallways and/or common areas.
- All schools visited had a dedicated library and specialized elective spaces. Most of these specialized elective spaces (93%) had the necessary and relevant equipment and supplies.
- Most schools (83%) also had well-maintained and age-appropriate play equipment and/or athletic facilities.

Six schools (20%) had issues with exterior and/or interior areas. The exam team observed that these schools’ interior and/or exterior areas were not accessible, well-maintained, or safe for all students, staff, and visitors. For example, one school had various student areas in disrepair (locker rooms, bathrooms, cafeteria), suspected mold in ceiling tiles, and the need for a new roof due to continued water leakage. The exam team assumes that the common issues identified with exterior and/or interior areas may be found in schools beyond the sample visited and are likely emblematic of the District accumulating deferred maintenance needs. Several principals noted maintenance teams were typically very responsive to requests for small repairs, though it was evident that facilities quality varied widely across schools. Some schools had modernized, well-kept buildings with updated libraries, gyms, and outdoor spaces while others suffered from more outdated infrastructure, HVAC issues, leaky roofs, non-functioning windows, and broken equipment.

Physical spaces for staff and students were inconsistent across school sites where some buildings had enough rooms for all staff to have classroom and office space, while other schools had shared classroom and office spaces that were inadequate for the number of students and teachers. Some principals cited over enrollment as the reason for inadequate space.

As noted above though, the majority of the 30 schools visited met the examining team’s standards for building security, safety, and general cleanliness of common areas.

FIGURE 88: EXAM TEAM SCHOOL VISITS - SCHOOL FACILITIES

EVIDENCE-BASED STRATEGY	Focus Area	Core Practice	Percent of Schools in Sample Demonstrating Core Practice
Facilities are accessible, well-maintained, and safe for all students, staff, and visitors	School-level	Building is physically secured (office check-in procedures, locked doors at all marked entrances and exits).	100%
		Exits / evacuation routes are clearly identified, and directional signage is adequate / accurate.	100%
		Hallways and common areas (i.e., restrooms / cafeterias) are clean before, during, and after use.	100%
		School has a dedicated library / media center.	93%
		School has specialized elective spaces for fine arts, physical education, CTE (where applicable).	93%
		School's specialized elective spaces have necessary / relevant equipment and supplies.	93%
		Exterior areas are well-maintained.	90%
		Interior areas are well-maintained.	87%
		Interior hallways include displays of student work / achievement / community events in common areas.	83%
		School has well-maintained and age-appropriate play equipment and/or athletic facilities (where applicable).	83%

Source: Exam team school visits.

Facilities Resource Distribution

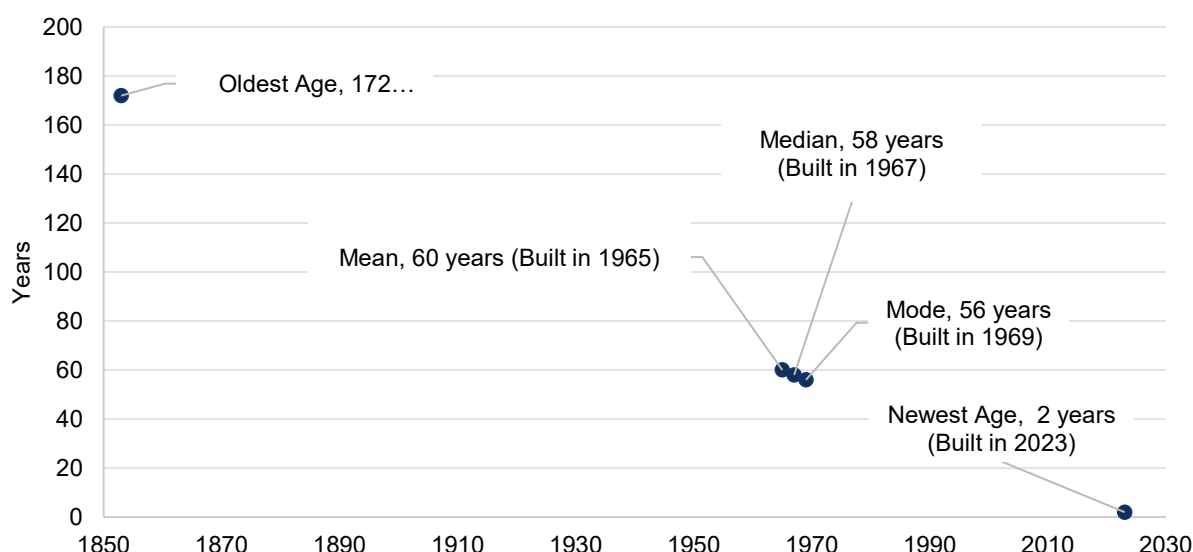
Age of Facilities

Observation	
6.5	School building age varies widely by Board District.

Across the District, the following list represents summative data on the age of school facilities as of 2025 (also shown in Figure 89):

- Mean age of school building: 60 years (built in 1965)
- Median age of school building: 58 years (built in 1967)
- Oldest age of school building: 172 years (built in 1853)
- Newest age of school building: 2 years (built in 2023)
- The most common school building age (Mode): 56 years (built in 1969)

FIGURE 89: AGE OF SCHOOL BUILDINGS, 2025



Source: Kentucky Facilities Inventory and Classification (KFICS) Ranked Report.

Aging facilities are not unique to JCPs. Schools across the country are also struggling with outdated facilities. In the United States, the average age of school buildings in 2024 was 49 years old and 38% of buildings were built before 1970.³²⁴ As buildings age, they require maintenance, renovations, and eventually rebuilding—47% percent of public schools in the country report their main instructional building has undergone major construction since it was built.³²⁵

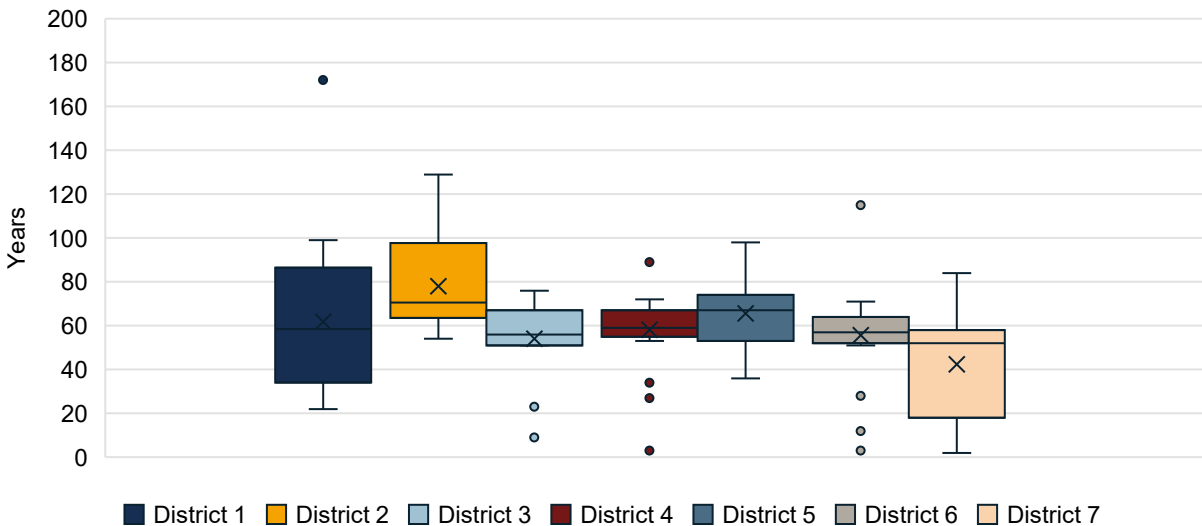
Figure 90 shows significant variation in building ages across Board Districts (See **APPENDIX E: JCPs School Board District Map**). Each box represents the middle 50% of building ages (the interquartile range), with the line inside the box showing the median age. The “whiskers” extend to the minimum and maximum values within a typical range, while dots outside the whiskers indicate outliers—schools that are much older or newer than most in their district.

- District 1 and District 2 had the widest range in age of schools, indicating both old (172 years old) and relatively newer facilities (22 years old).
- Districts 3, 4, and 6 had more compact distributions, suggesting more JCPs buildings were constructed around the same time.
- District 7 stood out for having the newest building (2 years old) and a relatively younger overall profile of age of buildings compared to other districts.

³²⁴ “[Condition of Public School Facilities](#)”. National Center for Education Statistics. Published 2024. Retrieved December 4, 2025. <https://nces.ed.gov/fastfacts/display.asp?id=94>

³²⁵ Ibid.

FIGURE 90: AGE OF SCHOOL BUILDINGS BY JEFFERSON COUNTY BOARD OF EDUCATION DISTRICT, 2025

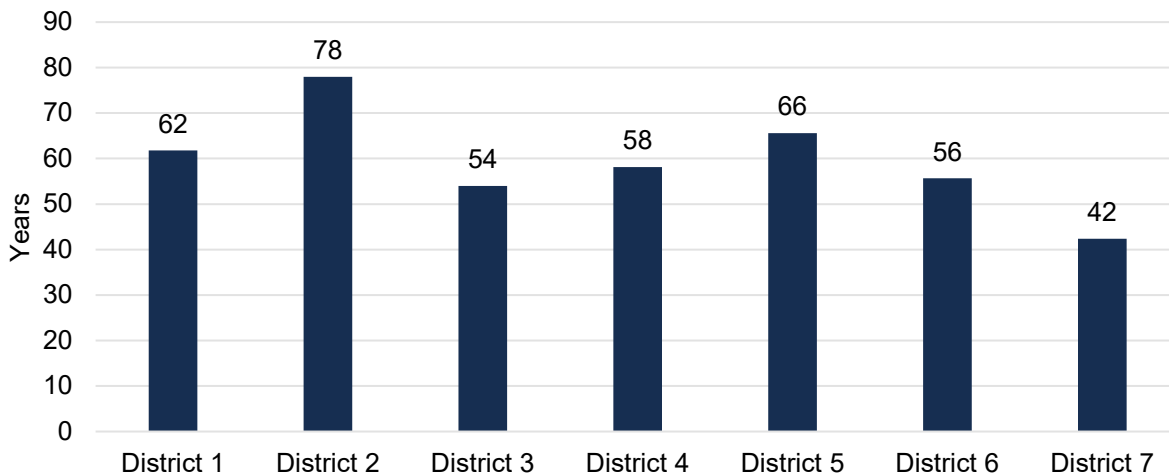


Source: Kentucky Facilities Inventory and Classification (KFICS) Ranked Report.

Note: Schools undergoing transition, mergers, or closure since the time of the KFICS report are not represented in the figure.

Shown another way, Figure 91 demonstrates that District 2 has the oldest school buildings with an average age of 78 years (built in 1947) while District 7 has the newest buildings with an average age of 42 years old (built in 1983).

FIGURE 91: AVERAGE AGE OF SCHOOL BUILDINGS BY JEFFERSON COUNTY BOARD OF EDUCATION DISTRICT, 2025



Source: Kentucky Facilities Inventory and Classification (KFICS) Ranked Report.

Note: Schools undergoing transition, mergers, or closure since the time of the KFICS report are not represented in the figure.

Relationship between Student Demographics and Building Age

The exam team conducted an analysis using the 2024-25 school year data of buildings and demographics to study whether there was a relationship between student demographics and the age of school buildings. Data analysis did not show a strong relationship between student demographics and building age. Although a weak correlation, schools with a higher share of students that identified as a racial minority or students that were from economically disadvantaged backgrounds tended to have slightly newer buildings. Further,

there was no relationship between the share of multilingual learners and the age of school buildings. Most schools were built in the mid-1900s, and demographic variation seems largely independent of building age.

Stakeholder Feedback Regarding Aging Facilities

Facilities and infrastructure emerged as common areas of concern in the exam survey among community members, school-based staff, and parents. While newer buildings received positive feedback, community members and families raised concerns about older schools in need of significant renovations, maintenance issues, and safety concerns from inadequate facilities. School-based staff also frequently cited the District's aging infrastructure and resource gaps as an area for improvement in survey response.

Recommendations	
6.5.a	JCPS should disaggregate the FPI analysis of planned facility changes by geographic area (such as Board District or zip code) The Board District analysis should be included in the annual FPI report to improve stakeholder transparency.
6.5.b	JCPS should include school building location as part of facility decision-making process, using building age as one indicator in addition to condition assessments, maintenance history, and documented repair needs, particularly in Board Districts with disproportionately older buildings.

Facility Capacity

Finding	
6.6	More than a quarter of schools are under-enrolled, representing an opportunity for consolidation and cost savings in capital infrastructure and maintenance.

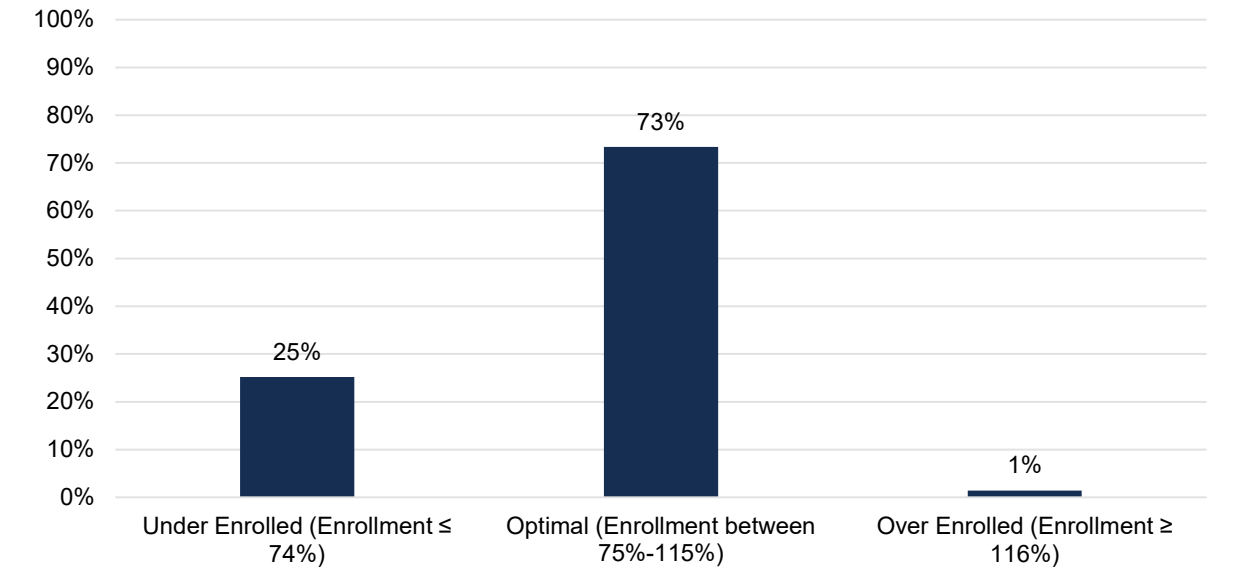
JCPS's FPI outlined enrollment capacity ratios across schools in the District. The enrollment data provided by JCPS GIS addressed three school years from 23-24 to 25-26, the first year of which aligns with the most recent financial data published by the Kentucky Department of Education (KDE) as reported for the 2023-24 school year. To address this two-year lag, the FPI calculated the average enrollment growth rate to establish enrollment projections across the 2023-24 through the 2025-26 school years. The exam team analyzed the 2025 KDE Condition Index to most accurately represent the current state of JCPS facilities at that time.

The FPI defined optimal enrollment as operating between 75% and 115% of building capacity. The report did not provide an explanation as to how the optimal enrollment range was determined. The exam team used this range to classify schools as under-enrolled (enrollment at 74% or below), over-enrolled (116% enrolled or greater), or optimally enrolled (between 75% to 115% enrolled).

Across the District, in the 2025-26 school year, schools operated at an average enrollment-to-capacity ratio of 84%, with a median of 87%. Special schools had a lower average enrollment-to-capacity ratio of 67% with a median of 83%. When excluding special schools and only focusing on traditional elementary, middle, and high schools, the mean student enrollment-to-capacity ratio rose to 86% with a median of 87%.

Figure 92 shows that in the 2025-26 school year, the majority of schools in JCPS operated at optimal capacity, which is defined by JCPS as enrollment between 75% to 115% of building capacity. Twenty-five percent of schools were under-enrolled, with enrollment below 74% of capacity. Only two schools were considered over-enrolled, with enrollment exceeding 116% of capacity.

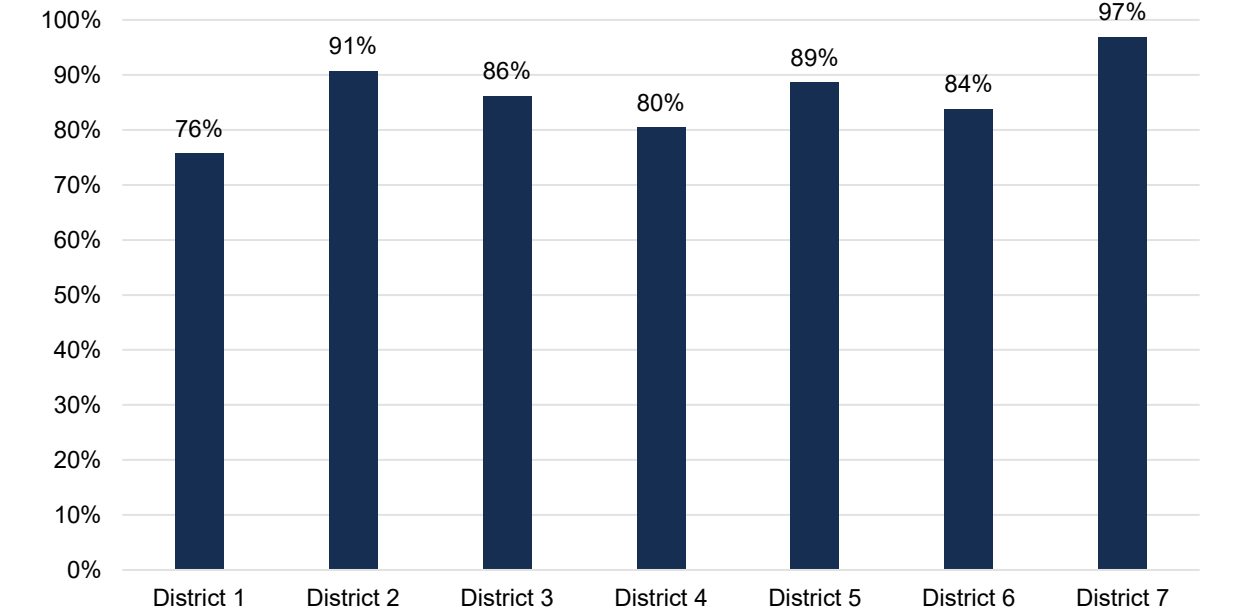
FIGURE 92: PERCENTAGE OF TOTAL JEFFERSON COUNTY PUBLIC SCHOOLS SCHOOLS BY CAPACITY CATEGORY, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools Facilities Profile Index (FPI) Report.
 Note: Enrollment thresholds defined by JCPS in FPI report.

Figure 93 shows that when analyzed by Board District, the mean student enrollment-to-capacity ratio ranges from a low of 76% (median of 76%) in District 1 to a high of 97% (median of 101%) in District 7. Across JCPS, the lowest average enrollment-to-capacity ratio is 21% in District 5 and the highest is 121% in District 2.

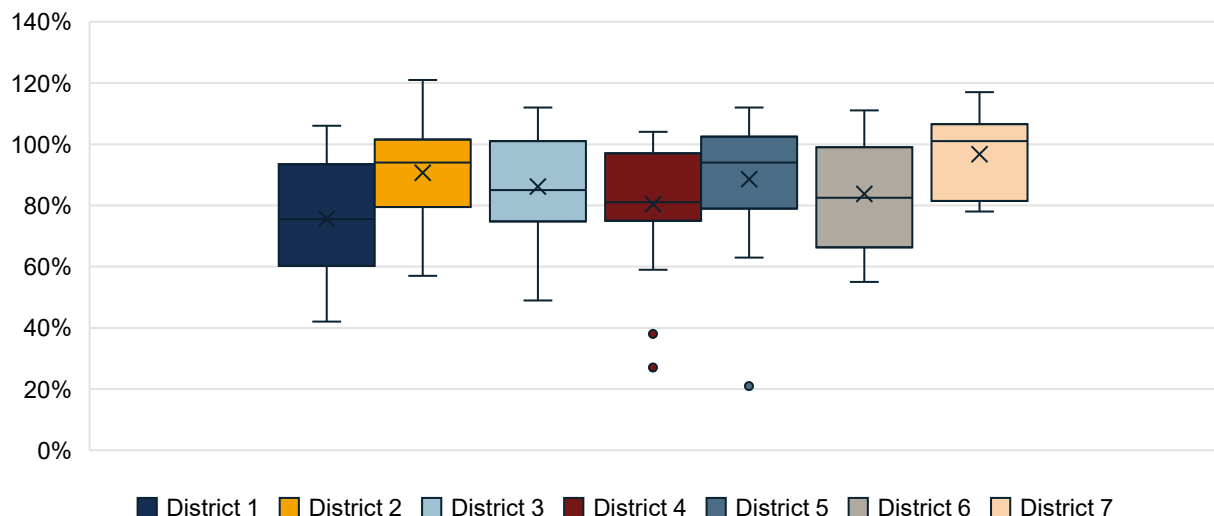
FIGURE 93: AVERAGE ENROLLMENT-TO-CAPACITY RATIO BY JEFFERSON COUNTY BOARD OF EDUCATION DISTRICT, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools Facility Condition Index.

Figure 94 indicates that District 4 and District 5 had the widest ranges of average enrollment-to-capacity, stretching from 27% to 104% in District 4 and 21% to 112% in District 5. These ranges are driven by outliers at 21% (District 5), and 27%, and 38% (District 4). Districts 1, 2, and 3 had moderate variability, with values clustered between 42% and 121%. District 7 had the highest median of 101%, followed by District 2 and District 5, both at 94%, suggesting that these districts are closer to full capacity. It is important to note that all schools are included in this analysis, including special schools.

FIGURE 94: SCHOOL ENROLLMENT-TO-CAPACITY RATIO BY JEFFERSON COUNTY BOARD OF EDUCATION DISTRICT, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools Facility Condition Index.

Over- and Under-Enrolled Schools

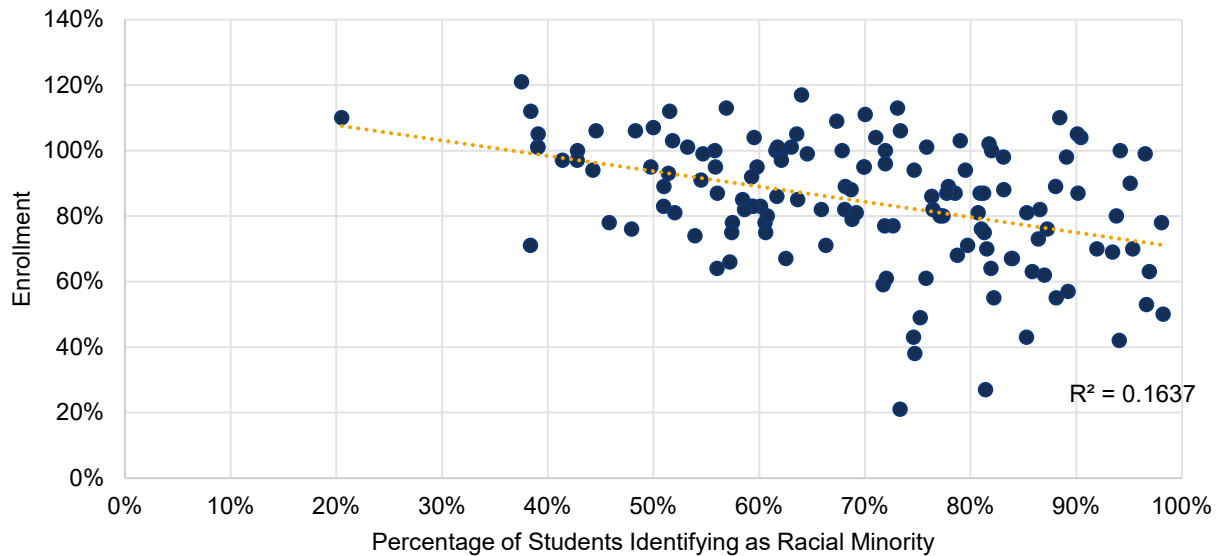
In the FPI report, JCPS identified eleven schools with enrollment concerns and were classified in FPI “Critical Categories.” All of these schools were considered under-enrolled and had enrollment capacity ratios ranging from 21% at Georgia Chaffee Teenage Parent Program to 70% at King Elementary. Beyond the FPI report, the exam team also found that two schools in the 2025-26 school year were considered over-enrolled: Ramsey Middle (117%) and Atherton High (121%). Neither of these schools were flagged in the FPI report’s “Critical Categories.”

Relationship between Student Demographics and Capacity

Overall, there was not a strong correlation between school enrollment-to-capacity ratios and the percentage of enrolled students who identified as racial minorities, economically disadvantaged, or multilingual learners. Schools with a greater share of students from racial minority groups or economically disadvantaged backgrounds tended to operate below capacity, but these relationships did not indicate a strong or consistent pattern. For multilingual learners, the relationship with capacity was negligible.

Figure 95 shows that as the percentage of students identifying as a racial minority increased, the enrollment-to-capacity ratio tended to fall. This suggests that schools with higher racial minority representation may have operated below capacity more often than those with lower racial minority representation. However, only 16% of the variation in capacity correlated with the percentage of racial minority students, denoting a weak relationship between the two factors.

FIGURE 95: SCHOOL ENROLLMENT-TO-CAPACITY BY PERCENTAGE OF STUDENTS IDENTIFYING AS A RACIAL MINORITY

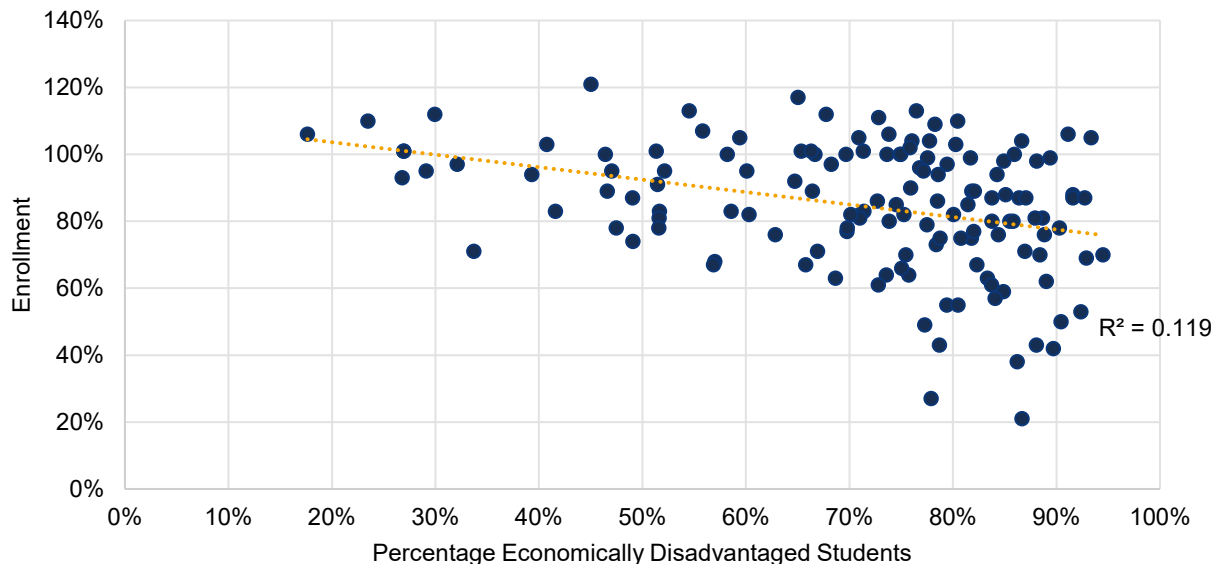


Source: Jefferson County Public Schools Facility Condition Index and the Kentucky Department of Education Report Card Dashboard.

Note: Data for enrollment capacity is from 2025-26 school year, and student demographic data is from 2024-25 as the newer year was not available at the time of writing.

Similarly, Figure 96 shows that as the percentage of economically disadvantaged students increased, schools' enrollment capacity tended to decline. The relationship was not strong, indicating a weak correlation between enrollment-to-capacity ratio and percentage of economically disadvantaged students.

FIGURE 96: SCHOOL ENROLLMENT-TO-CAPACITY RATIO BY PERCENTAGE OF STUDENTS FROM ECONOMICALLY DISADVANTAGED BACKGROUNDS

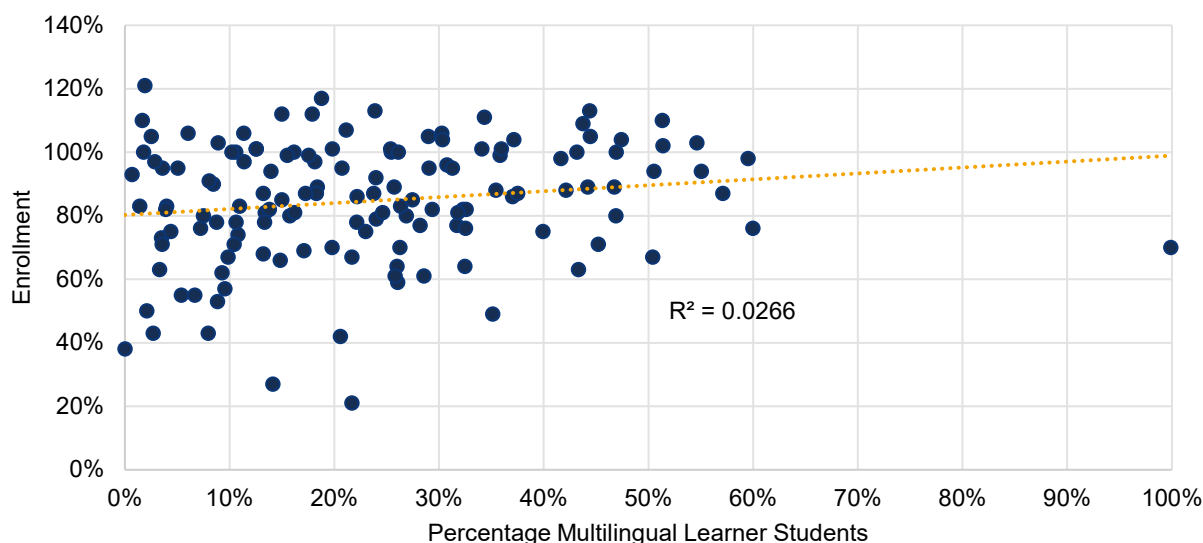


Source: Jefferson County Public Schools Facility Condition Index and the Kentucky Department of Education Report Card Dashboard.

Note: Data for enrollment capacity is from 2025-26 school year, and student demographic data is from 2024-25 as the newer year was not available at the time of writing.

Figure 97 shows that schools with more multilingual learners tended to have higher enrollment, but this is not a strong relationship. The weak R^2 indicated that multilingual learner percentage explains very little of the variation in enrollment.

FIGURE 97: SCHOOL ENROLLMENT-TO-CAPACITY RATIO BY PERCENTAGE OF MULTILINGUAL LEARNERS



Source: Jefferson County Public Schools Facility Condition Index and the Kentucky Department of Education Report Card Dashboard.
 Note: Data for enrollment capacity is from 2025-26 school year, and student demographic data is from 2024-25 as the newer year was not available at the time of writing.

Recommendations	
6.6.a	JCPS should continue existing efforts to flag under-enrolled schools for potential consolidation or boundary changes to maximize efficiency and cost savings. JCPS should monitor class size changes associated with any consolidation or boundary changes.
6.6.b	JCPS should analyze schools on the cusp of the optimal capacity boundaries to further identify areas for resource optimization.

Classroom Environment Observations

As shown in Figure 98, most classrooms from the sample fostered an environment that was generally conducive to learning. Top strengths observed across the District included robust technology and appropriate acoustics, both of which were observed in all classroom visits. JCPS used ESSER funds to improve the audio environment in classrooms.

FIGURE 98: EXAM TEAM SCHOOL VISITS - CLASSROOM ENVIRONMENT

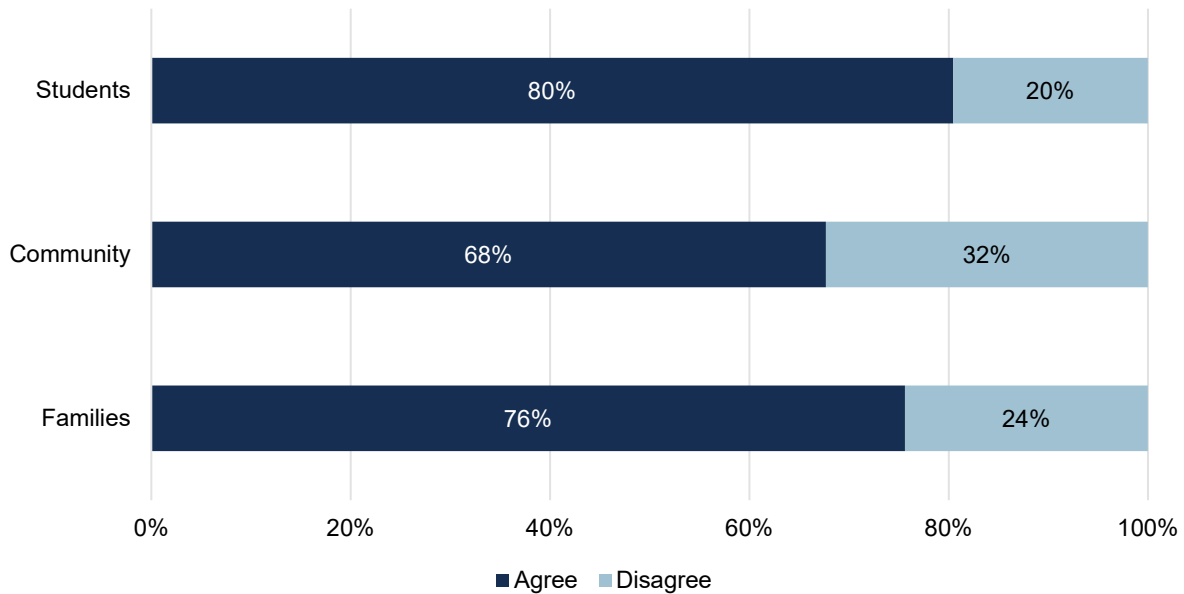
EVIDENCE BASED STRATEGY	Focus Area	Core Practice	Percent of Classrooms in Sample Demonstrating Core Practice
Physical classroom environment is inviting and conducive to learning for all students, staff, and visitors.	Classroom	Classroom has appropriate acoustic treatment to reduce ambient noise.	100%
		Classroom has robust technology for teachers and students to use (e.g., computers, projectors, interactive whiteboard, WiFi, etc.)	100%
		Classroom has adequate natural and artificial lighting.	95%
		Classroom is clean and has adequate walking space.	95%
		Classroom includes areas for students to work with teachers and peers in small groups.	93%
		Classroom is an adequate size for all students and teacher(s).	93%
		Classroom has comfortable temperature and ventilation through HVAC and functional windows.	91%
		Classroom lacks damaged ceiling tiles, blinds, paint, carpet, windows, etc.	91%
		Classroom displays affirm all students through inclusive imagery and celebrate high-quality student work.	77%

Source: Exam team school visits.

Stakeholder Perceptions of Facilities

As shown in Figure 99, the rate at which stakeholders agreed that JCPS schools are comfortable places to learn varied by group. Community members agreed at the lowest rate (68%) and students agreed at the highest rate (80%). Wording on this question varied slightly by stakeholder group, so students answered for only their school, while the community members responded for schools in general. Families responded for the school their student(s) attended.

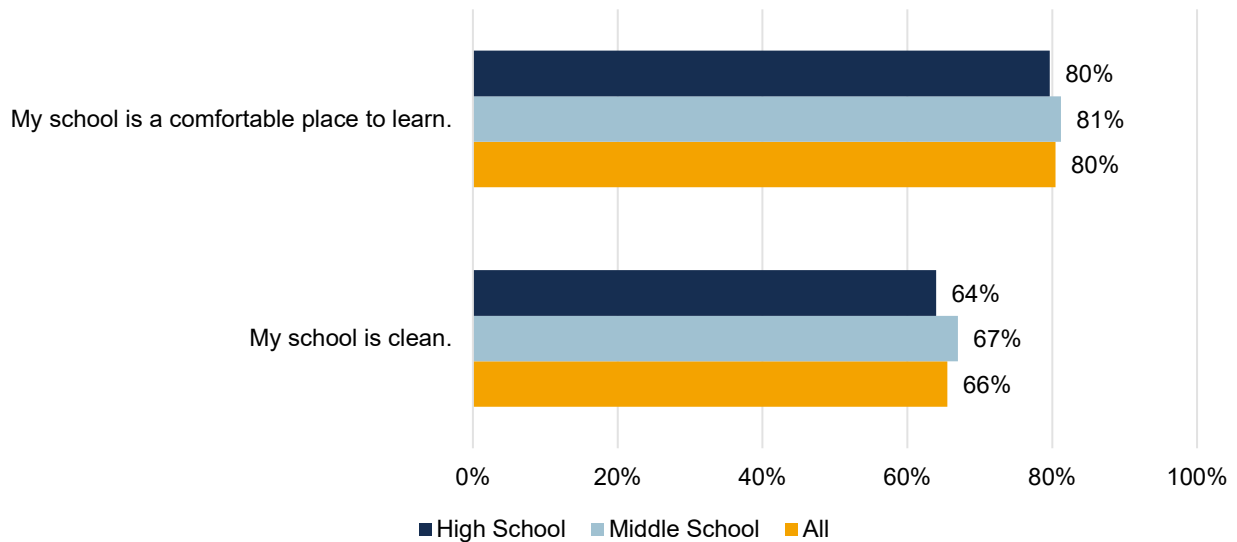
FIGURE 99: STUDENT, COMMUNITY AND FAMILY AGREEMENT WITH "JCPS SCHOOLS ARE/MY SCHOOL IS A COMFORTABLE PLACE TO LEARN"



Source: Special Examination Survey.

As shown in Figure 100, approximately 80% of all students agreed their school is a comfortable place to learn. About two-thirds of students agreed their school is clean. Regarding school cleanliness, high school students had slightly lower levels of agreement (64%) than middle school students (67%).

FIGURE 100: STUDENT PERCEPTIONS OF SCHOOL BUILDINGS BY GRADE BAND



Source: Special Examination Survey.

Although the majority of survey respondents indicated positive perceptions of comfort and cleanliness, all stakeholder groups cited concerns about facilities in open-ended responses. Common themes included maintenance needs, lack of cleanliness, and concerns with overcrowded facilities.

Maintenance

Students frequently noted poor building conditions, including issues with air conditioning, ventilation, and structural damage (such as ceilings and mold). Staff emphasized that facilities are outdated, inadequately maintained, and lack basic supplies and resources like functioning sinks and hot water. Numerous families commented on outdated or inadequately maintained school buildings. Some mentioned the need for essential facilities like student lockers or an athletic field.

Cleanliness

Cleanliness was a common concern, particularly in bathrooms. Comments referenced persistent problems, such as dirty or overcrowded restrooms, missing supplies, and unpleasant odors. Reports of mold, roaches, and rodents in cafeterias were also mentioned. Parents shared concerns about cleanliness and access to basic amenities.

Capacity

Overcrowding was cited as a significant issue by students, staff, and parents. Students described congested hallways, bathrooms, and buses, while those with IEPs also noted challenges with crowdedness during lunch periods. Staff reported large class sizes and high student-teacher ratios hinder individualized instruction and classroom management. Parents echoed concerns about overcrowded classrooms affecting instructional quality.

SCHOOL AND COMMUNITY NUTRITION SERVICES

The School and Community Nutrition Services Department, also known as 502 Food Works, ensures that students have access to healthy and safe meals and snacks at all times. The Department follows the USDA nutritional guidelines and provides breakfast, lunch, after-school programs, summertime meals, and emergency meals.³²⁶

JCPS School and Community Nutrition Services is fully funded (100%) by United States Department of Agriculture (USDA) reimbursements. JCPS is reimbursed at set rates by USDA for every meal served. Those reimbursements cover all costs, including food, staff salaries and fringe, equipment and supplies, and District operations costs. JCPS services over 100,000 meals to students every day.³²⁷

JCPS participates in the Community Eligibility program for free school meals where students are automatically enrolled through either direct certification from the state or through the Educational Benefits application form. Based on the high volume of students who automatically qualify through direct certification, JCPS is able to claim reimbursements for 97% of meals at the “free” rate through USDA. This threshold allows JCPS to offer breakfast and lunch free to all students.

While it is of great importance and deserves attention, the quality and nutritional value of the food served within JCPS is beyond the scope of this examination. However, the exam team did learn about the District’s food sourcing and cooking facilities from JCPS staff. JCPS operates a kitchen that cooks all meals from scratch. The 26-year-old central facility for the scratch kitchen is undergoing a significant revitalization and modernization project, intended to replace outdated equipment and appliances with more energy-efficient and cost-saving alternatives. JCPS can be reimbursed by USDA for certain allowable capital expenses. This initiative aims to reduce the operational strain on employees while addressing challenges such as stringent USDA regulations on food sourcing and the necessity to accommodate diverse cultural tastes among students. According to staff, JCPS has experienced challenges related to a new USDA requirement to purchase 90% of all school food domestically, leaving only 10% that can be sourced internationally. JCPS has had difficulties in sourcing ingredients like spices and juice domestically for their scratch cooking operations. JCPS participates in the Kentucky Department of Agriculture Farm to School

³²⁶ “[School and Community Nutrition Services](https://www.jefferson.kyschools.us/page/school-and-community-nutrition-services).” Jefferson County Public Schools. Retrieved February 12, 2026.
<https://www.jefferson.kyschools.us/page/school-and-community-nutrition-services>

³²⁷ Ibid.

program, sourcing locally grown products to cook in their scratch kitchen. JCPS also has approximately 30 schools with gardens where students can grow fresh produce.³²⁸

TECHNOLOGY DIVISION

Structure, Staffing, & Strategy

January 2025 Restructuring

The Technology Division underwent a restructuring in January 2025 in an effort to reduce costs and create efficiencies, and to better align with KDE's organizational structure.³²⁹ The Division is led by a Chief Information Officer (CIO).

One of the major changes in the January 2025 reorganization included shifting the Library Media Services department from the Academics Division to the Technology Division. According to the 2025-26 JCPS Technology Plan provided to KDE, "this transition recognizes the evolution from physical collections to the library media center as the hub for information and technology."³³⁰ According to many Technology Division staff, the restructuring was necessary to support digital literacy and learning in schools and has led to a more collaborative and cohesive environment, marked by improved inter-departmental communication and a desire for better coordination Districtwide.

Proposed 2026 Restructuring

Superintendent Yearwood's proposed February 2026 organizational chart staffing changes included eliminating the CIO role and moving the entire Technology Division under the Chief Business Officer, with an Executive Officer of Information Technology reporting to the Chief Business Officer and overseeing the Technology teams. The changes proposed include moving the Educational Technology & Media Services (Library Media) team back to the Academics Division.

Technology Staffing Challenges

In the exam survey and in interviews and focus groups with staff, concerns about staffing and resource levels were cited across multiple Technology teams, including data and application services, cybersecurity, and support.

Technology staff reported that some experienced, long-tenured staff quit or retired during the pandemic. The Division has reportedly faced issues filling some of those vacancies due to challenges with offering market-competitive salaries commiserate with specialized skillsets. In addition to the retirements and vacancies, the staff reductions and restructuring that occurred in January 2025 left some teams feeling like they did not have enough staff to cover the workload demanded of them and necessary to serve the technological needs of a large District. For instance, according to Technology staff, the infrastructure team lost four out of ten staff due to retirements, then one position was eliminated and three positions were moved to another team as part of the January 2025 restructuring. The team is now largely staffed by newer staff who have only been with the District since spring 2025.

In the staff survey, the Technology Division staff respondents had one of the highest rates of agreement (compared to other Divisions) that vacancies make it harder for them to get their work done. Staff reported that there is a concerted effort to update roles and offer competitive salaries to attract and retain skilled staff. However, sometimes they lose applicants during the onboarding process. The District is also reportedly exploring compensation adjustments to reflect the responsibilities of different roles. Similar to the trades roles in the Operations Division, only perception data was captured by the exam team related to

³²⁸ "[School and Community Nutrition Services](https://www.jefferson.kyschools.us/page/school-and-community-nutrition-services)." Jefferson County Public Schools. Retrieved February 12, 2026. <https://www.jefferson.kyschools.us/page/school-and-community-nutrition-services>.

³²⁹ "[2025-26 JCPS Technology Plan](https://docs.google.com/document/d/1BjRvRh-5w3T5VKR_y4itQq3rIMdiAM_LWYCftHy_kZI/edit?tab=t.0)." Jefferson County Public Schools. Retrieved December 10, 2025. https://docs.google.com/document/d/1BjRvRh-5w3T5VKR_y4itQq3rIMdiAM_LWYCftHy_kZI/edit?tab=t.0

³³⁰ Ibid.

Technology Division vacancies and compensation. The District may benefit from further analysis of Technology Division staffing issues.

ESSER-Funded Technology Initiatives and the Chromebook Funding Issue

Observation	
6.7	JCPS lacks a funded, sustainable, repair-and-replacement cycle for aging Chromebooks originally purchased with ESSER funds, which may impact the District's ability to maintain 1:1 device access for students.

According to District Technology leaders, sustaining equitable access to technology resources with the end of Elementary and Secondary School Emergency Relief (ESSER) funding is a challenge. ESSER funds allowed the District to rapidly expand technology access and move to a 1:1 device model for students, providing all students (nearly 100,000) with a Chromebook device. Prior to the pandemic, JCPS operated approximately 20,000 Chromebooks, according to staff. During the pandemic, the District used ESSER funds to purchase Chromebooks for students and buy SIM cards to support internet connectivity in students' homes. As a District, evolving to a 1:1 device model aligns with the recommendation from the U.S. Department of Educational Technology in the National Educational Technology Plan, "that every student and educator has at last one Internet access device and appropriate software and resources for research, communication, multimedia content creation, and collaboration for use in and out of school."³³¹

As the Chromebooks age, they require repair and replacement, and they began to show signs of decline simultaneously since most were purchased at the same time, according to staff. In FY23, a few years after the initial bulk purchase of Chromebooks using ESSER funds, the District began budgeting for repair and replacement needs. Budgeting for Chromebook repair and replacement needs, however, was short-lived. By FY25, allocated funds for this purpose had trickled off, and, by FY26, were nonexistent. JCPS budget allocations for Chromebook repair and replacement are detailed below:

- In FY23, the District began budgeting for a Chromebook annual replacement cycle to replenish devices that are outdated in schools. That replacement cycle was initially budgeted around \$4M annually (25,000 Chromebooks at \$160 per unit) so that about 25% of school's Chromebooks would be replaced each year.
- In FY24, that budgeted cost fluctuated to \$4.85M plus an additional \$1.2M to purchase Chromebooks for staff participating in the Kentucky Teacher Internship Program.
- By FY25, the Chromebook replacement costs were not included in the Working Budget and a \$200,000 cost associated with student Chromebook device repair was included with a budget narrative that explained the need for repair of broken Chromebook devices was greater than the current staff could maintain and repair services would have to be contracted out until there was a sustainable solution.
- The FY26 Working Budget cited Chromebook replacement costs as an unmet funding need.

In focus groups, Technology Division staff confirmed there is a Chromebook repair backlog of about 4,000 devices and an inadequate number of staff to keep up with the repair and maintenance of Chromebooks in the District. The estimated cost to replace all Chromebooks in the District at one time would be approximately \$15M, according to District Technology leaders. District leaders and staff across multiple Divisions cited the Chromebook replacement schedule as a major budget issue that the District needs to plan for in order to maintain equitable technology access and 1:1 devices for all students. According to District leadership, they currently have enough Chromebooks to get through the next few years, but if the repair and replacement funding and staffing needs are ignored, then it may be too big of a task to effectively

³³¹ "[Future State of Technology](https://sites.google.com/jefferson.kyschools.us/it3/future-state-of-technology)." Jefferson County Public Schools. Retrieved February 18, 2026.
<https://sites.google.com/jefferson.kyschools.us/it3/future-state-of-technology>

tackle at once. In the meantime, the Technology Division is trying to be strategic with how Chromebooks are deployed.

Another major initiative that started under ESSER and was sustained through \$30M of the FY23 General Fund was an audio enhancement project — that is, an effort to improve classroom paging and intercom technology. The audio enhancement project spanned multiple years to complete.

Technology leaders reported that the Division implemented several cost-saving strategies for the 2025-26 school year, which led to \$1.5M in savings. One major initiative that led to savings was shifting more District operations, especially in schools, from Microsoft to Google.

Recommendation	
6.7.a	JCPS should develop a funded Chromebook repair-and-replacement cycle to sustain 1:1 devices for students, assuming the further analysis recommended in this report about the efficacy of Chromebook use on academic achievement and career readiness yields positive results.

Technology Strategy

Observations	
6.8	The 2025-26 Technology Division restructuring and Technology Plan reflected JCPS leadership's intentional alignment with KDE regarding Educational Technology and Media Services under the Technology Division. The forthcoming organizational structure changes in the 2026-27 school year impact that alignment.
6.9	JCPS lacks a data governance framework to provide strategy and informed decision-making regarding roles, rules, processes, and resources that relate to District data and systems.

Technology Plan and Organizational Structure

KDE requires districts to create one-to-three-year strategic technology plans, which must align with the Kentucky Education Technology System (KETS) Master Plan. The current iteration of the KETS Master Plan spans from 2024 to 2030. Technology leadership explained that JCPS's current Technology Plan is a one-year (2025-26) plan, since the development of the plan occurred during a timeframe when they were undergoing an organizational restructuring and had a new Chief. The 2025-26 JCPS Technology Plan outlines the District's specific strategy and action items related to the KETS Future Ready Framework that includes eight areas "to assist districts in developing a roadmap for student success through personalized student learning and collaborative leadership."³³² JCPS action items listed in the Technology Plan include things like audio enhancement, LTE connectivity for students, a cybersecurity program, data governance, update maintenance and schedule upgrades for MUNIS, development of an IT internal budgetary process, and fiber maintenance rebid.

As it relates to the organizational structure, the 2025-26 JCPS Technology Plan states the following:

To more closely align with the Kentucky Department of Education's organizational structure, part of the JCPS reorganization included shifting the Library Media Services department from the Academics Division to the Technology Division. This transition recognizes the evolution from physical collections to the library media center as the hub for information and technology. Libraries are the place in each school where creation and creativity happen outside of the classroom and supporting this work with the entire Technology Division will be transformational for the future of

³³² "Future State of Technology." Jefferson County Public Schools. Retrieved February 18, 2026. <https://sites.google.com/jefferson.kyschools.us/it3/future-state-of-technology>.

education in our schools. It also allows for collaboration, efficiency, and a more integrated approach to supporting digital literacy and learning within our schools.³³³

It is unknown how or why the JCPS administration made the decision to move Library Media Services back to the Academics Division as part of the organizational restructuring that will be in place July 1, 2026. The Technology Division reported work on a new District Technology Plan to roll out in the 2026-27 school year and guide their work over the next three years. The new plan should address these organizational changes and any impact it has on the District's technology strategy.

As noted in the existing 2025-26 plan and as shared in interviews, leadership shared their expectations that instructional technology would be a major component of the new 2026-27 plan, as well as aligning technology use with professional learning and District policies, ensuring technology is embedded in schools' professional learning plans. Identifying ways to allocate resources to maintain existing technologies and sustain technology access post-ESSER, will also reportedly be a priority in the strategic plan.³³⁴

Data Governance Framework

Another issue that arose related to District technology strategy was the lack of a District data governance framework. Staff noted in focus groups that there is no overall governing body related to District systems and data, and siloing occurs between the Divisions. Staff cited their two largest systems as an example of silos — since Infinite Campus is under the umbrella of the Academics Division and MUNIS falls mostly under Finance Division, those systems are largely managed by those divisions without coordinated District-level governance. Technology staff cited a need for data governance driven by educators and championed by District leaders. A data governance framework would include documented policies, standard operating procedures, and defined roles and responsibilities to ensure data quality, privacy, and security. The framework may also include a complete inventory of all data systems and data collected, specific procedures for ensuring data accuracy and disposal, access controls, and security procedures. Importantly, data governance would identify data owners, stewards, and oversight teams accountable for specific datasets and systems across the District.

Recommendations	
6.8.a	Technology staff leaders should make updates, as needed, to their forthcoming District Technology Plan that reflects the 2026-27 changes to the organizational structure and District strategies and goals. The Technology Plan should address the move of Education Technology and Media Services back to Academics and how this move supports District technology strategy in alignment with the KETS Master Plan.
6.8.b	JCPS should consult industry research and best practices for technology use in school districts to help inform JCPS's approach to using Chromebook devices, instructional technologies, and AI, in alignment with District strategy and goals, particularly in areas of student learning and instruction.
6.9.a	JCPS should develop and document a data governance framework of policies, procedures, and roles regarding District data, including but not limited to, student, staff, and financial data in Infinite Campus and MUNIS.

Network and Infrastructure

The scale of technology infrastructure at JCPS is large and reflects the volume of sites, students, and staff the District supports. According to IT Division leaders, the staff manage over 100,000 ports across 170 schools as well as 16,000 phone lines, 11,500 wireless access points, and 4,000 switches in schools. The Division also manages a District data center with approximately 440 servers holding 1.7 PB of data. They

³³³ "2025-26 JCPS Technology Plan." Jefferson County Public Schools. Retrieved December 10, 2025.
https://docs.google.com/document/d/1BjRvRh-5w3T5VKR_y4itQq3rIMdiAM_LWYCftHy_kZI/edit?tab=t.0

³³⁴ Ibid.

also support GIS, camera servers, bus cameras, and the District operations center. This is accomplished with approximately nine network staff, including the Assistant Director who oversees the infrastructure team.

JCPS has a county-wide network transformation project planned. To help with “last-mile” connectivity gaps, the District maintains approximately 40,000 zero-cost lines of LTE connectivity by partnering with T-Mobile and their Project 10Million plan. But instead of relying on these leased lines, JCPS has plans to build out over 200 miles of fiber optic network to strengthen infrastructure against future technical and financial risks. The project is funded by E-Rate, a program overseen by the Federal Communications Commission (FCC) for schools and libraries to access discounts of 20-90% of the costs of eligible services and equipment and is planned to be completed over three years.³³⁵ According to Technology staff, this large-scale fiber project should help sustain JCPS infrastructure for the next 30 years.

Application and Data Services

Observations	
6.10	Low usage of teacher, parent, and student communications software by parents and students shows a need for a concerted effort on JCPS’s part to create better engagement.
6.11	JCPS’s payroll process is inefficient and could lead to errors.

On the application and data services side, the staff oversee Infinite Campus and MUNIS, the state mandated systems for student information and finance, respectively. The application and data services staff in the Technology Division also manage over 40 commercial off-the-shelf vendor applications and hundreds of custom reports in those applications for the District. According to staff, there has been a concerted effort to gain efficiencies by reducing the number of custom applications used by the District and using commercial off-the-shelf vendor products when feasible. Applications staff estimate they maintain approximately 200 custom applications developed by JCPS in addition to the commercial off-the-shelf vendor applications purchased by the District. All software used by JCPS can be seen at **APPENDIX F: JCPS Softwares and Applications**. This document lists out the products used by JCPS, if the product is district or school available, if staff or students use the products, and a description of the product. And the totality of classroom technologies includes the following: Chromebooks (both for teachers and students); audio enhancement technology; Apple iPads; Windows Laptops; robotics technology (VEX, Lego, Sphero, etc.) to enhance STEM education experiences; 3D printers; virtual and augmented reality headsets; laser printers; Google Translate; and SMART and ClearTouch interactive panels.

As it specifically relates to parent-student engagement and information dissemination, JCPS mainly uses the “JCPS App” powered by the Apptegy software through Thrillshare. Apptegy initially cost \$417,500 and requires a \$449,500 annual maintenance fee. This is a recent shift in communication platforms that sought to address the issue of JCPS parents feeling a lack of transparency from the district and failing to receive critical information about events occurring within the district. There are essentially three main components of Apptegy: Alerts, Rooms, and Engage. The Alerts feature disseminates updates to parents. The Rooms feature facilitates two-way communication between teachers, parents, and students. The Engage feature offers an optional newsletter program, helping students and teachers share news, updates, and important information in a structured format. JCPS can access analytics data about teacher, parent, and student use of Apptegy, with some notable data points that include the following:

- There are currently 15,185 families receiving messages in 121 different languages through Apptegy.
- 7,086 of 8,079 teachers (88%) have activated their Rooms account for the 2025-26 school year.
- 1,982 out of the 7,086 teachers (28%) with activated Rooms accounts used it in January 2026.
- 63,786 of 92,580 total students (69%) had at least one guardian activate their Rooms account this past school year.

³³⁵ “[E-Rate – Schools & Libraries USF Program](https://www.fcc.gov/general/e-rate-schools-libraries-usf-program).” Federal Communications Commission. Retrieved February 18, 2026. <https://www.fcc.gov/general/e-rate-schools-libraries-usf-program>

- 19,276 of those 63,786 guardians (30%) actually used Rooms in January 2026.
- 3,477 of the 94,037 students within JCPS (4%) activated their Rooms account for the 2025-26 school year.
- 1,050 of the 3,477 students (30%) actually used Rooms in January 2026.

In interviews and focus groups, application and data services staff cited concerns about lack of sufficient staff, resources, and time to do their work. Reductions in staff due to the reorganization, retirements, and hard-to-fill vacancies have left staffing levels at critically low levels, according to staff. Infinite Campus and MUNIS were cited as the most critical systems used by the District necessary to maintain basic operations. As described by staff, if either of these systems were to go down, the District would face what was called a “technical death,” where District operations grind to a halt due to technical system failure. Staff described difficulties managing the existing workload, expressing fear that their lack of capacity to take on new and necessary long-term sustainability projects (such as moving MUNIS to the cloud) may increase risk and worsen current technology issues and deficiencies.

The forthcoming organizational restructuring for 2026-27 school year includes a planned reduction of four out of the nineteen staff positions who report to the Assistant Director of Application and Data Services. Those positions slated to be eliminated include three software developers and the only webmaster.

Finally, JCPS staff noted that current technological limitations result in the payroll process taking at least several hours to complete. Staff noted that the process involves six hours of importing files from Time and Attendance to MUNIS, then after three days of editing to ensure data integrity, there is a three-hour process to close the payroll warrant, and another three and half hours to fully load images to a database called Tyler Content Manager. The totality of this process requires JCPS employees working overtime, usually well into the night, to ensure that payroll is processed in a timely manner.

Recommendations	
6.10.a	JCPS should analyze the reasons behind low parent and student use of teacher, parent, and student communication software to inform an action plan for creating better engagement.
6.11.a	JCPS should reevaluate its payroll process to determine what technological updates are needed to make that process more efficient and less risky.

Cybersecurity

According to staff feedback in focus groups, the Technology Division’s dedicated cybersecurity team works diligently to address potential risks and ensure data protection. Part of the cybersecurity team conducts digital resource review and develops comprehensive data governance policies to help maintain a secure and effective learning environment. The cybersecurity team also conducts “red teaming,” or simulating cyber-attacks to identify JCPS system vulnerabilities before malicious adversaries do.

JCPS was recently awarded a three-year, nearly \$4M grant from the FCC to support cybersecurity work. JCPS plans to use these funds to put systems and services in place to protect staff and student information, financial data, and instructional systems and resources.³³⁶ The team expressed concerns about how their work will sustain beyond the life of the grant funding and how future budget cuts will impact cyber risks to the District.

Artificial Intelligence (AI)

Observation	
6.12	Staff reported the District has taken a cautious approach to AI implementation, with a commitment to safety and gradual integration of new technologies.

³³⁶ “[JCPS Boosts Cybersecurity with Pilot Project](https://www.jefferson.kyschools.us/article/2370164).” Jefferson County Public Schools Communications. Published August 22, 2025. Retrieved February 18, 2026. <https://www.jefferson.kyschools.us/article/2370164>

Over 20 District leaders representing a range of departments participate in a Generative AI (GenAI) Executive Consulting Cohort in partnership with a third-party organization, Advanced Learning Partnerships, to help determine District AI practices and support AI policy development. The work of this group culminated into the JCPS AI Implementation Guide published in August 2025, which provides guidance for the JCPS community in alignment with KDE's guiding principles for incorporating AI use in the areas of equity, transparency, and data quality. The Guide is meant to be a working, evolving document that stays current with technological advances. The Guide outlines AI considerations for JCPS employees, safe and ethical AI integration, AI literacy, and more. It also includes potential AI uses for students, educators, and leaders, as well as guidelines for navigating appropriate AI use and disclosure.³³⁷

According to staff focus groups, as of Fall 2025, the District blocked generative AI for students but allowed AI access for staff and shared guidance for its use. Cybersecurity staff noted a digital divide has begun between students who have access to devices outside of JCPS and use AI, and students who only access JCPS devices and therefore do not use AI. In Fall 2025, JCPS began staff-directed GenAI implementation plans focusing on awareness, data security, and innovative approaches to instruction. This implementation phase also includes student participation in Digital Citizenship lessons targeted toward GenAI to learn more about ethical considerations and appropriate use of AI prior to being given access on JCPS devices. The Guide indicates that formal guidelines for citing AI in JCPS staff and student work are still under development. The Guide indicates future plans for all students across JCPS to have the ability to use GenAI platforms by August 2026.³³⁸

Recommendations	
6.12.a	JCPS should consult industry research and best practices for AI use in school districts to help inform the District's approach to incorporating AI into learning and instruction.
6.12.b	JCPS should develop systems for assessing impact of AI use by staff and students to understand the role it plays in student learning, instruction, and achieving District goals.

Technology Support Services

The Technology Division includes staff who support Tier I and II support needs, both virtually and in schools. The support team runs a customer service line call center for tech support, as well as a live chat feature and a ticketing system called incidentIQ. This is the same ticketing system used for facilities work orders. The system allows users to track the status of their ticket and any updates or changes. Support staff are deployed out to schools to provide direct supports, as needed.

The team also works across JCPS divisions to address digital enablement and delivery, strategically using technology to empower staff and students, streamline processes, and create a better end-user experience. The support services team reported being understaffed, particularly in the area of Tier I field support. The approved 2026-27 organizational staffing changes for the support and logistics teams in FY26 include the elimination of Professional Customer Care positions and the addition of new roles for IT Support Tech and Endpoint Tech, as well as an expansion of Computer Lab Technician roles. These shifts in support and logistics roles result in a net increase of one position among those teams, according to the approved 2026-27 organizational charts.

Education Technology and Media Services

The purpose of the Education Technology and Media Services team, according to IT staff, is to make technology work for education. The team manages library media, District textbooks, and a curriculum resource center where teachers can go to print, design, and develop materials to support their classrooms.

³³⁷ "Generative AI in JCPS: A Commitment to Responsible Innovation." Jefferson County Public Schools. Retrieved February 18, 2026. <https://www.jefferson.kyschools.us/page/generative-ai-in-jcps>

³³⁸ Ibid.

The library media roles support libraries directly and manage District textbooks. On the educational technology side of the unit, three specialists support principals and school leaders on technology integration and implementation and one educational trainer works on professional learning offerings. Staff reported the JCPS approach to working with schools is unique in the state in that they work with principals and school leaders on technology plans, policies, and professional learning rather than being in classrooms with teachers.

Prior to the January 2025 Technology Division reorganization, there were reportedly ten teachers working in education technology who would go in and meet with teachers and co-teach in support of technology and curriculum integration. The team reported the classroom-based approach was not found to be effective at improving school level outcomes. Under the current delivery model, the team consults with principals to discuss the school's technology plan, policies on devices, and approach to professional learning with technology, with the goal of aligning technology practices across the District.

The Education Technology team has partnerships with vendors like Canva, Adobe, Google, and Screen Castify, that can provide professional learning for JCPS staff. Technology staff do not conduct trainings directly. According to staff, the District makes these trainings available to JCPS schools at no cost.

In the survey, technology and instructional materials were one of the most frequently cited areas for improvement among school-based staff and families. It is unknown how the planned shift of Education Technology and Media Services from Technology back to the Academics Division in the 2026-27 school year will impact the team's function and operations.

Status of Findings from the APA's 2014 JCPS Examination Regarding Complaints

Findings	
6.13	JCPS does not have a formal review process in place to ensure IT policies and procedures are up-to-date.
6.14	JCPS gives local administrator rights to too many employees.

Two of the 45 findings outlined in the *Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District* report concerned (1) the fact that JCPS did not properly secure network data and resources (Finding 33) and (2) JCPS's IT policies and procedures were outdated (Finding 41).³³⁹ Follow-up on these findings revealed that JCPS does not have a formal review process in place to ensure policies and procedures affecting the Central Office level are current. In fact, JCPS has not reviewed its existing IT policies and procedures since their implementation around August of 2020. Additionally, JCPS still has 398 school-based staff that are local administrators who have the ability to download and install unauthorized software. As explained in the 2014 examination, the number of users with such access is unnecessary and creates security-related risks and other IT threats.

Recommendations	
6.13.a	JCPS should develop a formal review process to ensure at least an annual review of its IT policies and procedures to ensure compliance with the best up-to-date practices.
6.14.a	JCPS should reduce the number of individuals given local administrator rights to ensure that only those that truly need such access are given it.

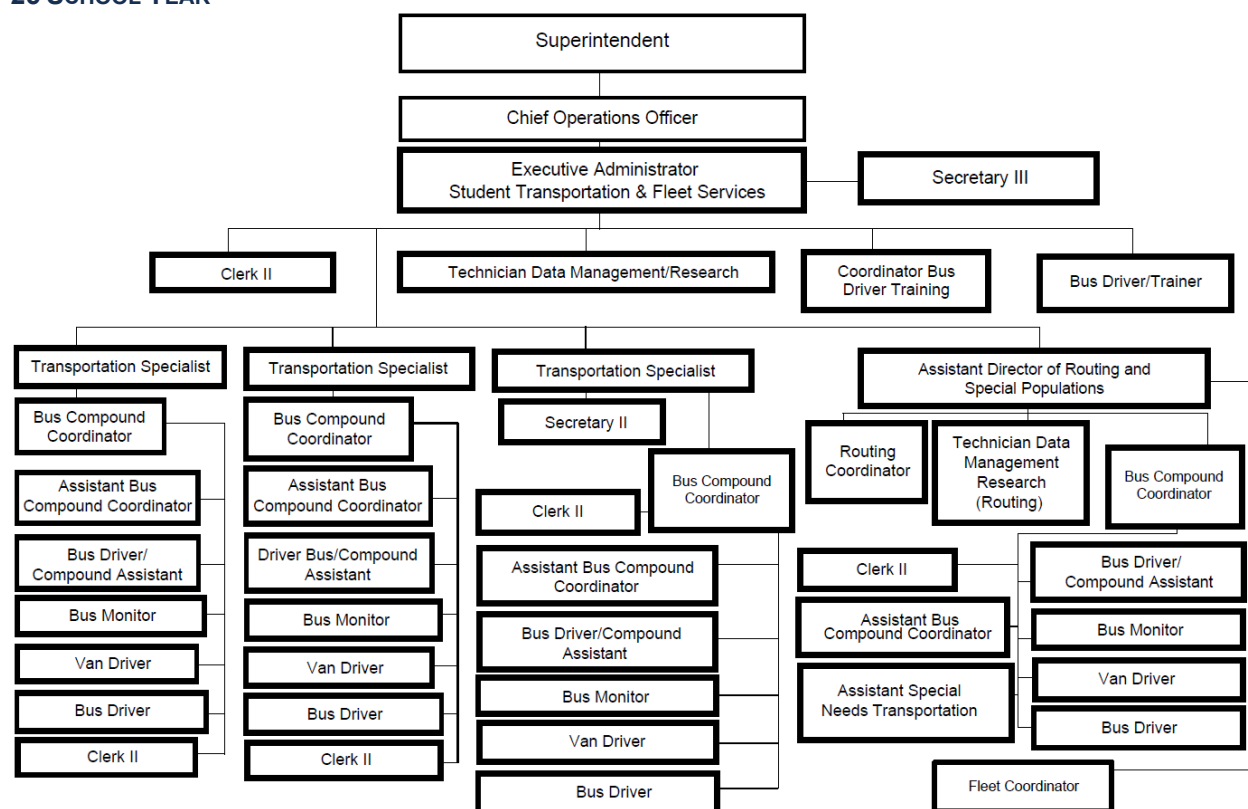
³³⁹ "Management Performance Review of Certain Policies, Procedures, Controls, and Financial Activity of the Jefferson County Public School District." Auditor of Public Accounts. Retrieved June 2, 2026. [PDF].

CHAPTER 7: BUS SAFETY

OVERVIEW OF TRANSPORTATION AT JCPS

JCPS's Operations Services Division (Operations) is responsible for maintaining the vehicle fleet, setting bus routes, managing facilities and grounds, and overseeing School and Community Nutrition.³⁴⁰ Operations consists of several departments, including the Student Transportation Services Department (Transportation).³⁴¹ As of June 25, 2025, an Executive Administrator oversees Student Transportation and Fleet Services and reports to the Chief Operations Officer (COO) as shown in Figure 101.

FIGURE 101: JEFFERSON COUNTY PUBLIC SCHOOLS TRANSPORTATION SERVICES ORGANIZATION CHART, 2024-25 SCHOOL YEAR



Source: APA, based on data and information provided by JCPS.

In the 2022-2023 school year, bus driver and permanent part-time bus driver positions reached their highest levels but began to decline in subsequent years, as presented in Figure 102.

FIGURE 102: BUS DRIVER POSITIONS, 2022-23 TO 2024-25 SCHOOL YEARS

JOB TITLE	2022-2023	2023-2024	2024-2025
Bus Driver	657	538	508
Permanent Part-Time Bus Driver	120	81	82
Total	777	619	590

Source: APA, based on data and information provided by JCPS.

³⁴⁰ "Operations Services Division." Jefferson County Public Schools. Retrieved June 3, 2026. <https://www.jefferson.kyschools.us/page/operations-services-division>

³⁴¹ Ibid.

During the examination period, JCPS's Transportation expenses totaled \$328,951,455 and were the highest in FY24, as outlined in Figure 103.

FIGURE 103: TRANSPORTATION EXPENSES DURING FY23, FY24, AND FY25

FISCAL YEAR	Transportation Expenses
2023	\$84,268,468
2024	\$123,071,756
2025	\$121,611,231
Total	\$328,951,455

Source: APA, based on data and information provided by JCPS.

Since 2023, JCPS has had 13 active bus compounds.³⁴² The number of transportation employees decreased in FY24, while the average number of miles driven daily increased, as presented in Figure 104.

FIGURE 104: TRANSPORTATION DATA DURING FY23, FY24, AND FY25

FISCAL YEAR	Total Enrollment	Number of Students Transported Daily	Average Miles Driven Daily	Number of Transportation Employees	Number of Buses
2023	96,533	62,702	83,806	862	729
2024	96,234	63,093	89,285	504*	827
2025	97,462	45,729	69,727	928	899

Source: APA, based on data and information provided by JCPS.

Note: The Number of Transportation Employees for FY 2024 is listed as reported and re-reported in JCPS's FYs 2024 and 2025 Annual Comprehensive Financial Report. JCPS, however, maintains that it had 858 transportation employees during FY 2024.

TRANSPORTATION-RELATED EVENTS IMPACTING THE EXAMINATION

Findings	
7.1	The contract with AlphaRoute was not properly evaluated and documented as to the justification behind its eligibility for non-competitive procurement.
7.2	The planning and implementation of three separate, multi-focused initiatives on the same day without input from all effected stakeholders contributed to the transportation issues that occurred on opening day in 2023.

2020 KDE Management Audit Report

KDE released the Jefferson County Management Audit Report (KDE Management Audit) on November 20, 2020. The KDE Management Audit was completed as part of the August 28, 2018 Settlement Agreement between KDE and the Board, in which KDE was to initiate a management audit, with the KDE Commissioner issuing report. Upon the audit's conclusion, the KDE Commissioner was to recommend either that no further action be taken, that JCPS be declared a "state-assisted" district, or that JCPS be declared a "state-managed" district. Additionally, the Settlement Agreement required JCPS to implement corrective measures until a new audit was finalized.³⁴³

The KDE Commissioner determined that there was no pattern of significant inefficiency or ineffectiveness in the governance and administration of JCPS, based on the findings outlined in the KDE Management Audit. Therefore, neither state management nor state assistance was necessary at the time, and the

³⁴² "Annual Comprehensive Financial Report for the Year Ended June 30, 2023." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "Annual Comprehensive Financial Report for the Year Ended June 30, 2024." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "Annual Comprehensive Financial Report for the Year Ended June 30, 2025." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁴³ "Jefferson County Management Audit Report." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

Settlement Agreement was considered fulfilled; however, the KDE Commissioner highly recommended that JCPS review the KDE Management Audit’s recommendations in detail and incorporate them into weekly cabinet meetings and the JCPS District Improvement Plan.³⁴⁴

The Management Audit included 25 recommendations, five of which pertained to Transportation. JCPS provided responses in 2023 to each of the 25 recommendations, explaining the progress made and how it was complying with each.³⁴⁵ The five transportation-related recommendations, along with JCPS’s 2023 response to each, are summarized in Figure 105.

FIGURE 105: KENTUCKY DEPARTMENT OF EDUCATION MANAGEMENT AUDIT TRANSPORTATION RECOMMENDATIONS AND JEFFERSON COUNTY PUBLIC SCHOOLS 2023 RESPONSES

RECOMMENDATIONS	Responses
Define a goal to improve the number of behavior referrals from pupil transportation that affect African American and exceptional children. While some driver training does address referrals for both student populations, there is no evidence of a systematic root-cause analysis to address the issue. Key factors may include the students’ grade level on buses, the number of students on buses, the proper assignment of experienced drivers, and the development of alternative transportation modes for students with multiple referrals.	Student bus referral data is reviewed monthly by staff from the JCPS Culture and Climate, Transportation, and Exceptional Childhood Education (ECE) departments. Student demographics, school, grade, and event type break down this data. Reviews highlight ECE students with numerous bus referrals, and plans are established to review IEPs to address behaviors. The group also regularly uses this data to review bus monitors and substitute placement. Finally, the team reviews bus referrals for accuracy and follows up with Zone secretaries, compound coordinators, or other relevant staff to address issues.
Implement a process that includes the transportation department in discussions on school choice and student assignment.	Transportation is currently undergoing a comprehensive organizational review, expected to be completed by January 2024. As part of the review process, these questions regarding school choice and student assignment are to be included.
Establish a recruitment plan to ensure JCPS has enough bus drivers and monitors to support the school choice opportunities.	Similar to all districts in the United States, JCPS faces critical bus driver shortages. JCPS has expanded bus driver recruitment efforts and significantly increased compensation packages for bus drivers. In addition to the large increase in base pay, JCPS has implemented bus driver incentives, including hourly bonuses for meeting attendance thresholds, driving challenging runs and routes, driving Early Childhood runs, and driving runs scheduled after 6:00 p.m.
Formulate and implement a system that accurately identifies buses for inspection at the appropriate mileage or time interval. The system should also focus on eliminating duplicate inspections.	The Transportation Department has a process in place to inspect buses for mileage and wear/tear, conducted by employees in the job classification “Inspector” in the Vehicle Maintenance Department. The processes are in accordance with Board Policy 06.12, Maintenance of the Bus Fleet, and Administrative Procedure 06.12 AP.1, Reporting of Mechanical Defects by Drivers; 06.12 AP.11, Repair of Mechanical Issues and Preventive Maintenance; and 06.12 AP.2, Driver Inspection Report.

³⁴⁴ “Jefferson County Management Audit Report.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁴⁵ Ibid.

Establish and implement a process for procuring tires, including new and used, to ensure compliance.

The Vehicle Maintenance Department has a tire replacement schedule aligned with recommended timelines.

Source: APA, based on data and information provided by JCPS.

AlphaRoute Contracting Process

The Board contracted through a non-competitive process with the consulting company AlphaRoute, formally known as Dynamic Ideas Routing, to redesign the district's transportation and busing routes for the 2023 school year.³⁴⁶ Per policy, JCPS requires completion of a *Non-Competitive Negotiation Determination and Finding* form when contracting non-competitively.³⁴⁷ The form lists nine reasons why non-competitive contracts are allowable, and JCPS selected the second option, which stated that there was only a single source for the items within a reasonable geographic area.

Instead of JCPS justifying the sole-source vendor, AlphaRoute provided a sole-source justification letter for the District on the company's own behalf. In the justification letter from AlphaRoute, the company states that, to its knowledge, it is the only vendor in the market that uses sophisticated mathematical modeling and machine learning to optimize entire bus fleets and district bell times.³⁴⁸ No further documentation was provided to the APA to confirm that JCPS verified these claims before proceeding with the non-competitive contract.

The Phase 1 report from Prismatic (as discussed below) also noted in a finding, within its Purchasing and Contracts section, that the reviewed documents lacked research and documentation explaining why sole sourcing for the service was selected and why the particular vendor was selected. Additionally, the documents reviewed did not indicate that references for the selected vendors were requested from the vendors or whether JCPS staff attempted to identify or contact previous customers, resulting in no references being verified and documented. Further, letters of justification for selecting the particular vendor using sole-source contracting were written by the vendor rather than JCPS staff.³⁴⁹

The Incident - First Day of School

On August 9, 2023 (the first day of the JCPS 2023-24 academic year), AlphaRoute's redesigned system resulted in a transportation disaster for the district. Students were on buses until nearly 10:00 p.m., leaving families waiting for hours for their children to return home.³⁵⁰ In response, JCPS canceled school until Friday, August 18, when all elementary and middle school students returned to school. All high school students returned to classes on Monday, August 21.³⁵¹

³⁴⁶ "DynamicIdeasLLC – AlphaRoute Amendment 02-02-2022." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁴⁷ "APA State Audit Request: Non-Competitive Determination Explanation." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "Noncompetitive Negotiation Determination and Finding. Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁴⁸ "DynamicIdeasLLC – AlphaRoute Amendment 02-02-2022." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁴⁹ "[An Assessment of the Transportation Program and the Transportation Activities of August 9, 2023 Phase 1 Report](https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/Prismatic%20-%20Document%20-%20JCPS%20Phase%201%20Report.pdf)." Jefferson County Public Schools. Retrieved June 3, 2026. <https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/Prismatic%20-%20Document%20-%20JCPS%20Phase%201%20Report.pdf>

³⁵⁰ "Kentucky School System Closes After 'Transportation Disaster' Leaves Kids on Buses and in Schools for Hours." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁵¹ "JCPS to Bring Some Students Back Friday After Transportation Debacle." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

Prismatic Report – Phase 1

JCPS contracted with Prismatic Services in October 2023 to assess the transportation activities of August 9, 2023 (Phase 1) and the transportation program (Phase 2). The goals of Phase 1 included performing a comprehensive analysis of the transportation activities of August 9, 2023 (the Incident); identifying and assessing the conditions that gave rise to the Incident; providing recommendations to address those conditions; and providing commentary regarding the potential for conditions that gave rise to the Incident and any related root-cause analysis impacting other aspects of JCPS operations.³⁵² (The goals and outcome of Phase 2 will be discussed later in this section.)

The Phase 1 Report by Prismatic noted that three separate initiatives were implemented on JCPS's first day of school for 2023-24, including:³⁵³

- School Choice Initiative (SC): The rolling out of a new student assignment plan, giving families different school choices than they previously had.
- School Start Time Initiative (SST): The development of new school start times recognizing the latest sleep science and the district's bus driver shortage.
- Routing Optimization Initiative (RO): The use of new software tools to attempt to improve route efficiency, thereby reducing the number of bus drivers required.

In Operations' post-analysis of the problem, all three initiatives contributed to the Incident. The three initiatives were deeply intertwined, and the implementation of SC and SST relied on RO to reduce the number of bus drivers required and get students to school on time.³⁵⁴ Prismatic's review of the RO Initiative resulted in four findings.³⁵⁵ First, AlphaRoute did not adhere to the routing timeline that JCPS had generally used in years prior. In addition, there were critical points of failure in the 2023-24 RO timeline, including AlphaRoute not providing JCPS route information until July 10, 2023; however, the route information was incomplete, which required JCPS to return it to AlphaRoute for finalization, resulting in the finalized routes being delivered to JCPS on July 17, 2023. As the AlphaRoute routes were not delivered until July 17, half of the days JCPS typically uses in July to add stops, make last-minute changes, and incorporate new additions into already finalized routes were eliminated. These failures were exacerbated by two other decisions made earlier in the RO process: accepting incomplete data from AlphaRoute as its RO work progressed, and excluding the Transportation department from most of the RO planning.³⁵⁶ Second, AlphaRoute provided JCPS with inadequate bus routes for the 2023-24 school year.³⁵⁷ Third, the JCPS transportation department was not provided with essential information regarding the AlphaRoute routing solution as it was being implemented, resulting in a lack of tools and training to work quickly to address identified problems, which added to the disruptions and poor quality on August 9, 2023.³⁵⁸ Fourth, a lack of modern routing tools to analyze the AlphaRoute routing solution and to quickly make needed adjustments was a contributing factor to the problems on August 9, 2023.³⁵⁹

The Prismatic team further concluded that several conditions led to the Incident. Those conditions included JCPS areas operating below best-practice levels: Project Management, System Implementation, Organizational Communications, Decision-Making Methodology, and Contractor Performance.³⁶⁰

³⁵² ["An Assessment of the Transportation Program and the Transportation Activities of August 9, 2023 Phase 1 Report."](#) Jefferson County Public Schools. Retrieved June 3, 2026.

<https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/Prismatic%20-%20Document%20-%20JCPS%20Phase%201%20Report.pdf>

³⁵³ Ibid.

³⁵⁴ Ibid.

³⁵⁵ Ibid.

³⁵⁶ Ibid.

³⁵⁷ Ibid.

³⁵⁸ Ibid.

³⁵⁹ Ibid.

³⁶⁰ Ibid.

Decision to End Magnet School Bus Routes

After the incident, JCPS decided that runs had to be cut. According to Transportation staff, this was a simple math problem — too many runs and not enough bus drivers. To determine how to cut runs, Transportation staff determined that JCPS is only required to transport ECE and McKinney-Vento students. It was also discussed that students who attend magnet schools, which accept students from across the district, are not required to be provided transportation.³⁶¹

During a special-called meeting on April 10, 2024, the former Superintendent and the Transportation team presented a series of options to the Board for the 2024-25 school year.³⁶² Transportation evaluated 16 transportation models and presented four options to the Board, as summarized in Figure 106.³⁶³

FIGURE 106: TRANSPORTATION OPTIONS, 2024-25 SCHOOL YEAR

OPTION	Description	Start Times	Routes	Estimated Lost Instructional Minutes	Clear Times
On Time	Discontinue transportation services for all magnet and traditional schools.	7:30 a.m. 8:40 a.m. 9:40 a.m.	486 476 476	0	On Time / 6:00 p.m.
With Delays	Only continue magnet and traditional transportation to high schools at or above the 75% free-and-reduced-lunch threshold.	7:30 a.m. 8:40 a.m. 9:40 a.m.	506 492 476	4,000,000 – 5,000,000	6:15 p.m. – 6:25 p.m.
With Delays	Only continue magnet and traditional transportation to K-12 schools at or above the 75% free-and-reduced-lunch threshold.	7:30 a.m. 8:40 a.m. 9:40 a.m.	510 530 495	5,000,000 – 6,000,000	6:20 p.m. – 6:30 p.m.
Not Feasible	No changes to transportation services.	7:30 a.m. 8:40 a.m. 9:40 a.m.	580-600 580-600 580-600	17,000,000 – 18,000,000	7:45 p.m. – or later

Source: APA, based on data and information provided by JCPS.

Three of the options would result in lost instructional minutes and clear times after 6:00 p.m. The only option that would ensure on-time transportation service was to discontinue transportation services for all magnet and traditional schools. This option was the recommended action by the Operations Division, as it would have resulted in an estimated zero lost instructional minutes and a clear time of 6:00 p.m.³⁶⁴ The Board, however, voted to adopt Option 2 during the special meeting, which would discontinue transportation service to all magnet and traditional schools except high schools with more than 75% of students eligible for free-or-reduced lunch.³⁶⁵ Option 2 would take effect in 2024-2025.

³⁶¹ “Magnet Program.” Jefferson County Public Schools. Retrieved June 3, 2026.

<https://www.jefferson.kyschools.us/page/magnet-program>

³⁶² “Jefferson County Board of Education Minutes of Special Meeting of April 10, 2024.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁶³ “JCPS Transportation Options.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁶⁴ Ibid.

³⁶⁵ “Jefferson County Board of Education Minutes of Special Meeting of April 10, 2024.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

Prismatic Report – Phase 2

Phase 2 of the JCPS contract with Prismatic Services focused on the transportation program.³⁶⁶ The goals of Phase 2 were to perform a comprehensive evaluation of the program, identify deficiencies and opportunities for improvement, and provide recommendations to address deficiencies and enhance the program.³⁶⁷ The Prismatic team ultimately made 20 recommendations designed to improve the efficiency and effectiveness of the JCPS Transportation Department after reviewing available documents and files, interviewing JCPS leadership and Transportation Department staff, observing operations, touring the bus compound facilities, and surveying transportation staff and JCPS parents. Two primary underlying themes emerged from those recommendations: performance measurement and communication, and staffing management.³⁶⁸ According to JCPS, it has either already addressed or is continuing to work on addressing the issues and recommendations identified by Prismatic.

Recommendations	
7.1.a	JCPS should complete the Non-Competitive Negotiation Determination and Finding form for all applicable procurements and follow up on references. In addition, justification for this approach should be written by JCPS, not the vendor, and should provide detailed, acceptable justification for using this approach.
7.2.a	JCPS should strive to make implementation of new initiatives inclusive for all stakeholders. Early involvement by all parties may decrease the likelihood of future incidents.

RECRUITMENT & RETENTION

Bus Driver Pay

JCPS guarantees full-time bus drivers an eight-hour workday, though some may work slightly longer. To compensate, JCPS analyzed pay scales for bus drivers and special needs transportation assistants (SNTAs) in preparation for the 2024-25 school year, resulting in additional compensation to support recruitment and retention efforts.³⁶⁹ Additionally, all salary schedules were analyzed over the last six months at JCPS.³⁷⁰ Figure 107 presents the increases in the hourly salary schedule for bus drivers between the 2022-23 and 2025-26 school years.

FIGURE 107: BUS DRIVER HOURLY SALARY SCHEDULE, 2022-23 TO 2025-26 SCHOOL YEARS

GRADE	2022-23	2023-24	2024-25	2025-26
0	\$16.89	\$17.74	\$24.09	\$24.81
1	\$17.81	\$18.70	\$25.07	\$25.83
2	\$18.71	\$19.65	\$26.04	\$26.82
3	\$19.76	\$20.75	\$27.16	\$27.98
4	\$20.71	\$21.75	\$28.18	\$29.03
5	\$21.69	\$22.77	\$29.23	\$30.11
6	\$22.68	\$23.81	\$30.29	\$31.19

³⁶⁶ “An Assessment of the Transportation Program and the Transportation Activities of August 9, 2023 Phase 2 Report.” Jefferson County Public Schools. Retrieved June 3, 2026.

<https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/Prismatic%20-%20Document%20-%20JCPS%20Phase%20%20Report.pdf>

³⁶⁷ Ibid.

³⁶⁸ Ibid.

³⁶⁹ “Salary Schedule 1B – Bus Drivers and Special Needs Transportation Assistants.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; “State Audit Follow-Up Inquiry.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁷⁰ “State Audit Follow-Up Inquiry.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

GRADE	2022-23	2023-24	2024-25	2025-26
7	\$23.66	\$24.85	\$31.34	\$32.28
8	\$23.66	\$24.85	\$31.34	\$32.28
9	\$24.60	\$25.83	\$32.35	\$33.32
10	\$24.60	\$25.83	\$32.35	\$33.32
11	\$25.61	\$26.90	\$33.43	\$34.44
12	\$25.61	\$26.90	\$33.43	\$34.44
13	\$26.66	\$28.00	\$34.56	\$35.59

Source: APA, based on data and information provided by JCPS.

Incentives & Stipends

In addition to the bus driver's hourly salary schedule, JCPS has implemented incentives and stipends to recruit and retrain bus drivers.³⁷¹ When hired, bus drivers are offered one of three options for the New Bus Driver Incentives, as outlined in Figure 108.

FIGURE 108: NEW BUS DRIVER INCENTIVES

TYPES OF NEW BUS DRIVER INCENTIVES	Incentives	Description
New Bus Driver without CDL	\$150 plus CDL fees	Full-time or permanent part-time bus drivers hired after July 1, 2016, will be paid a one-time \$150 incentive after successful completion of a 90-day probationary period, and will receive reimbursement of the CDL license fee up to \$75 upon successful completion of training. This incentive is payable only once during the driver's career, including any breaks in service.
New Bus Driver with CDL	\$2,000	Full-time and permanent part-time bus drivers hired after July 1, 2024, who have a CDL will receive a one-time \$2,000 incentive after successful completion of a 90-day probationary period. This incentive is payable only once during the driver's career, including any breaks in service.
New Bus Driver with CDL and School Bus Endorsement	\$4,000	Full-time and permanent part-time bus drivers hired after July 1, 2024, who have a CDL and School Bus Endorsement will receive a one-time \$4,000 incentive after successful completion of a 90-day probationary period. This incentive is payable only once during the driver's career, including any breaks in service.

Source: APA, based on data and information provided by JCPS.

JCPS also offers a Challenging Bus Stipend for runs that may be more difficult to handle. The amount per hour and the number of challenges, as listed in the JCPS Salary Schedule for 2025-2026, are as follows:³⁷²

- \$5.00 per hour for one challenge
- \$7.50 per hour for two challenges
- \$10.00 per hour for three challenges

Effective on July 1, 2024, bus drivers and SNTAs who are continuous, permanent JCPS employees with no break in service would be eligible for Longevity Pay as follows:³⁷³

- 10 years as of July 1st: \$0.20 per hour

³⁷¹ "Salary Schedule 1B – Bus Drivers and Special Needs Transportation Assistants." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁷² Ibid.

³⁷³ Ibid.

- 15 years as of July 1st: \$0.60 per hour (includes \$0.20 for after 10 years)
- 20 years as of July 1st: \$0.80 per hour (includes \$0.60 for after 15 years)
- 25 years as of July 1st: \$1.00 per hour (includes \$0.80 for after 20 years)

Surveys

Finding	
7.3	Although exit surveys were sent to bus drivers via electronic link and a reminder on the official resignation notification of change form, JCPS does not have the responses. Additionally, exit surveys are not required.

In September 2024, Transportation began sending surveys to bus drivers every other month during the school year to gather feedback on concerns and areas for improvement. According to the Transportation staff, the surveys don't yield much, which is considered a good sign that there are not many issues. Bus drivers are also surveyed separately during the opening scrimmage practice at the end of July/beginning of August, as they prepare for the first day of school, using a different set of questions focused on first-day preparedness.³⁷⁴

Additionally, JCPS sent an anonymous 33-question exit survey to employees who left during FY23, FY24, and FY25, including bus drivers and monitors, to understand why they left JCPS and to learn from their reasons for leaving and their experiences with JCPS.³⁷⁵ While exit surveys were sent via electronic links and a reminder was included on the official resignation notification of change form, JCPS indicated that they did not have responses and that exiting employees are not required to complete the exit survey.³⁷⁶

Recommendation	
7.3.a	JCPS should consider making exit surveys mandatory and using the feedback to identify trends in employee turnover, provide training where needed, and take other steps to prevent future employee departures.

BEHAVIOR INCIDENTS

Findings	
7.4	Survey data at the per-school level reflected a concerning level of fear among students who ride the bus to school.
7.5	For 2022-23 and 2024-25, 33,358 out of 42,712 behavior incidents on a bus were committed by repeat offenders, indicating JCPS's disciplinary policies and processes for bus incidents and referrals are not effective.

Survey Opinions on Bus Safety

The Comprehensive School Survey (CSS) is an annual survey that collects school and workplace climate data from several stakeholders associated with JCPS, including students in grades 4 through 12, parents, school-based certified staff, and non-school-based certified and classified staff.³⁷⁷ The CSS asks multiple questions regarding bullying, a caring environment, curriculum, an equitable environment, home

³⁷⁴ "APA Request: Board Policy." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁷⁵ "JCPS Exit Survey." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁷⁶ "Bus Driver & SNTAs/Bus Monitor Questions & Responses." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁷⁷ "JCPS Comprehensive School Survey." Jefferson County Public Schools. Retrieved June 3, 2026. <https://sites.google.com/jefferson.kyschools.us/jcps-css/home>

educational resources, overall satisfaction, personal safety, school administration, school belonging, school engagement, school resources, site safety, student agency, success skills, and teaching.³⁷⁸ Specifically, Figure 109 presents the percent agreement among elementary, middle, and high school students during 2023, 2024, and 2025 regarding the personal safety question, “I feel safe on my way to and from school.”

FIGURE 109: STUDENT AGREEMENT WITH "I FEEL SAFE ON MY WAY TO AND FROM SCHOOL"

GRADE BAND	2023	2024	2025
Elementary School	86%	88%	90%
Middle School	86%	88%	90%
High School	88%	90%	91%

Source: APA, based on data and information provided by JCPS.

Additionally, parents were asked a similar question about their child’s personal safety: “I believe my child feels safe on the bus to and from school.”³⁷⁹ The percent agreement among parents was lower than that among students, as presented in Figure 110.

FIGURE 110: PARENT AGREEMENT WITH "I BELIEVE MY CHILD FEELS SAFE ON THE BUS TO AND FROM SCHOOL"

	2023	2024	2025
Parents	83%	79%	86%

Source: APA, based on data and information provided by JCPS.

All that being said, at the per-school level, student and parent respondents showed lower rates of agreement with that statement. More specifically, for students and parents at certain schools, the percentage of those agreeing with that statement dropped to the low 70s, 60s, and even 50s. This shows that JCPS should make targeted inquiries with the students and parents at those specific schools to understand and correct the contributing factors to those low rates of agreement.

Criteria Addressing Bus Behavior

Code of Acceptable Behavior and Discipline

KRS 158.148 requires the Board to adopt a student Code of Acceptable Behavior and Discipline (the Code), based on KDE’s statewide student discipline guidelines, and to post it at each school and reference it in all school handbooks. Additionally, a process must be developed to provide information to school employees, parents, and legal guardians, and to train employees. The Code must prohibit bullying and establish standards of acceptable student behavior and discipline. JCPS must report to the Center for School Safety when a school disciplines a student for a serious incident, and data collected on an individual student who commits a reportable incident must be placed in that student’s disciplinary record. The Board must submit a report to KDE no later than August 1 of each year that includes the following:³⁸⁰

³⁷⁸ “[Comprehensive School Survey Comparison Report 2023](#).” Jefferson County Public Schools. Published May 11, 2023. Retrieved June 3, 2026.

<https://docs.google.com/spreadsheets/d/1tQ95vomGYI5UCbldjX1KcZwj4CL5OVK5/edit?gid=1364278482#gid=1364278482>; “[Comprehensive School Survey Comparison Report 2024](#).” Jefferson County Public Schools. Published May 7, 2024. Retrieved June 3, 2026.

<https://docs.google.com/spreadsheets/d/1qigQXTillqRHRBzjM3DE22r3se9nRyT7/edit?gid=444990253#gid=444990253>; “[Comprehensive School Survey Comparison Report 2025](#).” Jefferson County Public Schools. Published May 1, 2025. Retrieved June 3, 2026. https://docs.google.com/spreadsheets/d/1ZD_-c3yXjpcpW21aK-mTfUlpBXJx_tA4/edit?gid=1505175784#gid=1505175784

³⁷⁹ Ibid.

³⁸⁰ “[Code of Acceptable Behavior and Discipline Policy](#).” Kentucky Department of Education. Published June 18, 2025. Retrieved June 3, 2026. <https://www.education.ky.gov/school/sdfs/Pages/Student-Discipline-Guidelines-and-Model-Policy.aspx>

- The number of behavior incidents for each tobacco, nicotine, or vapor-related product, listed by school and grade; and
- The number of incidents for which medical intervention was provided, listed by school, grade, and product.

KDE Pupil Transportation Management Manual

JCPS uses KDE's Pupil Transportation Management Manual (Manual) as an operational reference.³⁸¹ According to the Manual, preventing student behavior problems is the best way to address them. All rules and regulations concerning student behavior should be known and clearly understood by the Board, administrators and teachers, bus drivers, students, and parents. The Board is responsible for setting the tone for the safe transportation of students by adopting clear and concise policy statements. The principal or their designee must assume responsibility for enforcing the rules and regulations regarding student transportation to ensure bus drivers can effectively perform their duties. Teachers have a chance to reinforce safety instructions and materials in the classroom. A school bus driver must set the proper example, and their attitude toward students is critical. Students must uphold their share of responsibility for safety. At the same time, students have the privilege of riding a school bus, which is contingent on good behavior and observance of the rules and regulations set forth by the Board. Finally, safety awareness must begin at home and be consistently reinforced by parents.³⁸²

Board Policy 06.34 Conduct on Bus

According to Board Policy 06.34 Conduct on Bus, bus drivers must promptly report any violations of JCPS policy or school rules to the principal, who has the authority to discipline students who ride school buses. Bus drivers may file a written or electronic complaint or report regarding student misconduct, including a recommendation to revoke transportation privileges. If one or more pupils behave in a threatening or violent manner or in such a way as to endanger the safety of other students on the bus, the bus driver must stop the bus and contact the bus garage or the Superintendent's designee to send someone to pick up the student or, if the behavior warrants, call law enforcement. In accordance with Board Policy 09.2261, if calls for assistance are unsuccessful, the bus driver is authorized to order the offending student off the bus if the student is in sixth grade or above.³⁸³

Further, in the case of habitual or serious conduct violations, the principal is authorized to withhold bus-riding privileges for up to 10 school days per occurrence and must notify parents when bus-riding privileges are withheld. Upon filing a written report with the Superintendent or the Superintendent's designee, bus drivers may refuse to transport students who violate the Code of Acceptable Behavior and Discipline until an interim or final determination has been made. Additionally, bus-riding privileges may be withheld by the Superintendent or the Superintendent's designee for a period of time up to the remainder of the school year. Students with special needs exhibiting inappropriate conduct must be managed in accordance with their IEPs and/or 504 Plans, as well as the legal obligations and the Board's adopted standards.³⁸⁴

JCPS Transportation Training Manual

The JCPS Transportation Training Manual outlines five control techniques for bus drivers that should help them manage the situation. These include:³⁸⁵

1. Establish a personable and acceptable student-to-driver relationship.
2. Establish and maintain a safe atmosphere on a school bus.
3. Provide leadership through driver performance.
4. Successfully apply behavior control techniques.

³⁸¹ "Jefferson County Management Audit Report." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁸² "Pupil Transportation Management Manual." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁸³ "[Jefferson County Board of Education Policy 06.34 Conduct on Bus \(Transportation\)](#)." Kentucky School Board Association. Published June 24, 2025. Retrieved June 3, 2026. <https://policy.ksba.org/Chapter.aspx?distid=56>

³⁸⁴ Ibid.

³⁸⁵ "Transportation Training Manual." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

5. Analyze proper procedures and methods for dealing with individual and group behavior problems.

JCPS Student Support and Behavior Intervention Handbook

JCPS's Student Support and Behavior Intervention Handbook (SSBIH) addresses bus safety, noting that behavior expectations while on a school bus are established to ensure that all students have a safe ride to and from school each day. The same behavior standards are in effect when a student is riding the bus or waiting at a designated bus stop and apply to students as they do on school property or at school functions, activities, and events. Violations involving the school bus and/or incidents that occur while students are on the way to or returning to the school bus stop/neighborhood may result in a consequence, meaning the school administrator can address a student's inappropriate behavior. This may include suspension of bus privileges, in-school consequences, suspension from school, and/or referral to or placement in an alternative school.³⁸⁶ Figure 111 displays the safety expectations for bus riders found in the SSBIH.

FIGURE 111: SAFETY EXPECTATIONS FOR BUS RIDERS

B	Be Responsible	
	• Be on your best behavior. • Obey the driver's instructions. The driver of a school bus is in complete charge of their passengers. • Eating, drinking, and smoking are not permitted on the school bus. • Keep the bus clean. Do not throw trash on the floor.	• Do not mar or deface the bus. Seat covers must not be damaged in any manner. Anyone caught damaging the equipment will be subject to consequences and/or to making restitution. • Pets and animals are not allowed on the bus at any time.
U	Use Respect	
	• The driver has the authority to assign seats. • Use your inside voice. • Do not wave or shout to pedestrians or occupants of other vehicles. Do not throw objects out of the bus windows. • Know that using profanity and making obscene gestures on the school bus are prohibited.	• Keep hands, feet, and objects to yourself. • Do not fight or scuffle on the bus or create any loud disturbances. • Refrain from talking to the driver, except in an emergency.
S	Stay Safe	
	• Be seated immediately, and remain seated while the bus is in motion. If a seat is not available, hold onto the back of a seat. • Keep your head, hands, and feet inside the bus. • Students may not stand in the stairwell while the bus is in motion.	• Books and backpacks should remain in your lap and not be placed in the aisleway. Instruments and large objects will be allowed on the bus only if they can be held on the lap. • Do not tamper with the emergency door, fire extinguisher, or other equipment on the bus.

Source: APA, based on data and information provided by JCPS.

Incident Handling & Prior Issues Noted

Bus Referral Process

JCPS Transportation staff stated that, when an incident occurs on a school bus, the bus driver must complete a bus referral on the morning or afternoon of the incident. The next morning, a staff member from the Culture and Climate Department is at the bus compound to input the referral into Infinite Campus. The student's principal or the principal's designee has 48 to 72 hours to respond and is responsible for investigating the incident and any resulting disciplinary actions. Additionally, JCPS has two video systems on buses, 247 and Samsara. If there is a fight on a school bus, the bus driver can call the bus compound and have someone log in remotely via Samsara to monitor the situation, assist if needed, and alert the school. The ability to watch the bus video live and review it later allows the principal or their designee to fulfill their role in investigating and verifying that the student did what was reported in the referral. The results

³⁸⁶ "24-25 Student Support and Behavior Intervention Handbook." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

of the principal's or the designee's investigation of the incident are entered into Infinite Campus, and the bus driver can see the incident's outcome.

JCPS bus referrals totaled 16,592 in the 2022-23 school year but decreased to a total of 10,183 in the 2024-25 school year.³⁸⁷ Between the 2022-23 and 2024-25 school years, 33,538 incidents were committed by repeat offenders out of a total of 42,712 bus referrals, as outlined in Figure 112.

FIGURE 112: BUS REFERRALS 2022-23 TO 2024-25 SCHOOL YEARS

REPEAT OFFENDER	2022-23	2023-24	2024-25	Total
No	3,561	3,191	2,422	9,174
Yes	13,031	12,746	7,761	33,538
Grand Total	16,592	15,937	10,183	42,712

Source: APA, based on data and information provided by JCPS.

September 26, 2023, Board Work Session

During the Board's Work Session on September 26, 2023, one Board member shared feedback from bus drivers, including that student behavior and a lack of consequences for referrals were reasons for leaving the position. An additional Board member agreed, noting that some kids do not feel safe riding the bus because of other students' behavior causing fear. The students that do not feel safe must then adjust how they get to and from school, and their parents are the ones inconvenienced or have difficulty getting them there.³⁸⁸

2020 KDE Management Audit Report

Pursuant to Section 2(2)(b)3 of Kentucky Administrative Regulation 703 KAR 3:205, the transportation system must "provide training for personnel responsible for the safe transportation of children in accordance with the Kentucky Board of Education administrative regulations."³⁸⁹ The KDE Management Audit found that behavior data is used to drive training. African American students and students in the ECE program have a disproportionate rate of behavior referrals from incidents occurring on school buses.³⁹⁰

The recommendations from KDE's 2020 Management Audit included establishing a goal to improve the number of referrals from pupil transportation affecting African American and exceptional children. While some driver training does address referrals for both student populations, there is no evidence of a systematic root-cause analysis to address the issue. In 2023, JCPS responded that staff from "the JCPS Culture and Climate, Transportation, and ECE departments meet monthly to review student bus referral data." Its response stated that this review "highlights ECE students with numerous bus referrals and plans are established to review IEPs and address behaviors. This group also regularly uses this data to review bus monitor and substitute replacement. Lastly, the team reviews bus referrals for fidelity and follows up with Zone secretaries, compound coordinators, and other relevant staff to address issues."

Prismatic Report

The Prismatic Phase 2 report stated that although there has been much attention and recent efforts to improve, "the district does not yet have the complete confidence of its bus drivers and transportation management team in handling bus discipline issues."³⁹¹ The report noted that JCPS's Student Support

³⁸⁷ "JCPS Bus Referrals Repeat Offenders." Jefferson County Public Schools. Retrieved June 3, 2026. [Microsoft Excel].

³⁸⁸ "Jefferson County Board of Education Minutes of Work Session of September 26, 2023." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁸⁹ "Jefferson County Management Audit Report." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁹⁰ Ibid.

³⁹¹ "[An Assessment of the Transportation Program and the Transportation Activities of August 9, 2023 Phase 2 Report](#)." Jefferson County Public Schools. Retrieved June 3, 2026.

and Behavior Handbook includes supportive words that lay the groundwork for safe, orderly bus riding. However, the responses from JCPS’s transportation leaders “did not reflect widespread adherence to these behavioral standards.”³⁹²

Prismatic recommended that JCPS readdress and revamp its approach to student conduct on its school buses. To implement the recommendation, JCPS “should assign climate and culture department staff members to work full-time at the bus compounds, not just to stop by to pick up referral slips.” Prismatic recommended these staff members be expected to lead driver/attendant training and interact directly with bus drivers.³⁹³

JCPS’s September 2025 Update to the APA on the Prismatic report recommendations stated that “Climate and Culture staff has been assigned to each compound. Their primary responsibility is to collect bus referrals and enter them into our data system.” As the assigned staff are behavior consultants, they “also provide best practice resources for bus drivers at the compounds as needed. All bus drivers receive PBIS and trauma-informed care training annually.” Additionally, JCPS reported that transportation resources in the Student Support and Behavior Intervention Handbook have been expanded to include expectations and procedures for administering discipline on buses, which have been added to the JCPS website and included in communication outlets.³⁹⁴

Student behavior and discipline are discussed in more detail in **Chapter 8: Student Supports, Culture, & Climate**.

Recommendations	
7.4.a	JCPS should conduct more detailed and targeted analyses of the contributing factors to student fears about bus riding safety where per-school survey responses showed greater levels of fear.
7.5.a	JCPS should review its disciplinary policies and processes for bus incidents and referrals to ensure they are effective and enforced to the extent necessary. Bus safety should be a top priority for the district, and any policy or process related thereto should be consistently and thoroughly applied.

OTHER OBSERVATIONS AND AREAS FOR FURTHER STUDY

Further study may be warranted regarding the two areas previously noted as findings in the 2020 KDE Management Audit, as this examination did not entail a review of those areas, which include:

- The purchase and maintenance of equipment to safely and efficiently transport children to school, as the finding noted bus inspections were not timed efficiently or effectively, and there are some instances of duplication and other instances of past-due inspections.³⁹⁵
- Adhering to bidding requirements for the purchase of equipment and materials necessary to conduct JCPS’s transportation program, as the finding noted, JCPS had installed non-approved tires on some school buses and purchased used recapped tires that are brands not authorized by KDE.³⁹⁶

<https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/Prismatic%20-%20Document%20-%20JCPS%20Phase%202%20Report.pdf>

³⁹² Ibid.

³⁹³ Ibid.

³⁹⁴ “Updated JCPS Response to Full Prismatic Report Sept 2025.” Jefferson County Public schools. Retrieved June 3, 2026. [PDF].

³⁹⁵ “Jefferson County Management Audit Report.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

³⁹⁶ “Jefferson County Management Audit Report.” Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

Additionally, in the course of this examination, JCPS relayed that all bus drivers receive background checks, and there were no bus driver behavior incidents that JCPS relayed to the examination team. That being said, as should be done with all personnel within JCPS, continuous review and monitoring of the suitability of all transportation personnel for their roles would help to ensure the safety of all JCPS students. Again, as with all of its personnel, JCPS would benefit from conducting periodic detailed reviews of the credentials and performance of all of its transportation personnel.

CHAPTER 8: STUDENT SUPPORTS, CULTURE, & CLIMATE

This chapter discusses JCPS's approach to supporting student well-being. Specifically, it examines the factors that impact students' ability to learn along with the resources, programs, and plans the District has in place to support students. These include specialized staffing, support services, and community partnerships. The chapter is broken into eight sections:

- **Student Supports**, including discussion of mental and behavioral staffing as well as academic and non-instructional services provided throughout the District.
- **Family and Community Engagement, Partnerships, and Resources**, including family engagement and community support services in the District.
- **School Culture and Climate**, including implementation of the recently enacted Board Cell Phone policy along with its impact on school climate.
- **Attendance and Chronic Absenteeism**, including dropout prevention and re-engagement strategies.
- **Extracurricular Activities and Athletics**, including a brief overview of the benefits of participating in extracurricular activities along with barriers to participation shared by JCPS students in the exam team's survey.
- **School Safety**, including arrival and dismissal procedures, weapons detection, and violence prevention.
- **Student Behavior and Discipline**, including District policies and data on student discipline.
- **JCPS Police Department (JCPD)**, including sentiment around the establishment of JCPD, structure of the Department, and citation data.

OVERVIEW, STAFFING, AND ORGANIZATIONAL STRUCTURE

The Division of Student Support Services and the Division of School Culture and Climate are housed in the Office of the Chief of Staff and are led by assistant superintendents who report directly to the Chief of Staff. The Division of Student Support Services is responsible for going beyond classroom instruction to support students' welfare and success, and the Division of Culture and Climate provides support to educators to create a healthy and caring learning environment. The two Divisions both touch on student support, safety, and non-instructional interventions with the goal of creating a productive learning environment for students.

This structure will change in July 2026 with the organizational structure changes the Board approved in February 2026. In the approved organizational structure, the Division of Student Support Programs will be led by the Executive Officer of Student Support & Community Engagement, who will report directly to the Superintendent. The Division of School Culture and Climate will be led by the Executive Director of Success & Resilience, who will report to the Chief of Strategy & Innovation.³⁹⁷

During stakeholder interviews, the two Divisions highlighted their collaboration and regular meetings. As the Board-approved organizational structure takes effect on July 1, 2026, JCPS should ensure this collaboration continues given the significant overlap in their work.

STUDENT SUPPORTS

The Student Supports Division aims to ensure that students' academic and non-academic needs are addressed so they can show up to class ready to learn. The Division's work is explicitly framed around reducing barriers to learning and supporting student well-being beyond the classroom.

³⁹⁷ Schanie, Adi. "[JCPS organizational charts outline which central office jobs are being cut.](https://www.wdrb.com/news/education/jcps-organizational-charts-outline-which-central-office-jobs-are-being-cut/article_5fbd39ed-2355-4e0a-b97d-ba669ca84169.html)" WDRB. Published February 9, 2026. Retrieved February 12, 2026. https://www.wdrb.com/news/education/jcps-organizational-charts-outline-which-central-office-jobs-are-being-cut/article_5fbd39ed-2355-4e0a-b97d-ba669ca84169.html

The Student Supports Division is made up of the following departments:

- **Guidance Services:** School counselors who support students socially and academically;
- **Mental Health Services:** Mental Health Practitioners in schools to support student mental health;
- **Family Resource & Youth Services Centers (FRYSC):** Services to remove barriers to student learning;
- **Community Support Services:** Interventions to help students persist in school;
- **Crisis Response Team:** Services to students when school-based mental health professionals need additional supports;
- **Parent & Family Engagement:** Supports and opportunities that enable families to actively participate in their child's education and school community;
- **Elev8 Student Learning Centers:** Additional academic instruction, targeted tutoring, and college and career support for students.

Mental and Behavioral Health Staffing

Observation	
8.1	JCPS currently exceeds national recommendations for student-to-school counselor ratios but falls short of national recommendations for student-to-school psychologist ratios. This difference may reflect how JCPS has structured its student support staffing model.

Staff that work directly with students to support their wellbeing in JCPS include counselors, psychologists, social workers, mental health practitioners (MHPs), and board-certified behavior analysts (CBAs).

- **School counselors** work in individual schools and provide students with individual and group counseling along with academic and career planning.
- **School psychologists** are certified personnel responsible for administering a variety of assessments as part of initial evaluations or re-evaluations for students suspected of having or with disabilities, which are required under the Individuals with Disabilities Education Act (IDEA) and Kentucky Administrative Regulations (KAR).
- **School social workers** provide individual, group, and family counseling and life skills development, along with school-related social services to students.
- **Mental Health Practitioners (MHPs)** work at the school-level to promote health wellness of students through providing interventions at the individual and group level.
- **Board-Certified Behavior Analysts (CBAs)** provide behavioral supports to schools and students when students are not responding to existing school-based interventions and supports.
³⁹⁸ CBAs often support students with Individualized Education Programs (IEPs), particularly students on the autism spectrum.

This section focuses primarily on mental and behavioral health staffing provided to all students. Since CBAs support students with disabilities, they will be discussed further in **Chapter 12: Exceptional Children Education**. Figure 113 shows JCPS school counselor and psychologist staffing compared to the nationally recommended ratios and its peer districts.

³⁹⁸ “[JCPS Human Resources: Job Descriptions](https://www.jefferson.kyschools.us/page/job-descriptions).” Jefferson County Public Schools. Retrieved March 16, 2026.
<https://www.jefferson.kyschools.us/page/job-descriptions>

FIGURE 113: STUDENT-TO-SCHOOL COUNSELOR AND -SCHOOL PSYCHOLOGIST RATIOS BY PEER DISTRICT, 2024-25 SCHOOL YEAR

DISTRICT	Student to School Counselor Ratio	Student to School Psychologist Ratio
Recommended Ratio	1:250 ³⁹⁹	1:500 ⁴⁰⁰
Jefferson County Public Schools	1:193	1:1,942
Baltimore City Public Schools	1:518	1:676
Duval County Public Schools	1:508	1:2,454
Guilford County Schools	1:310	1:1,250
Pinellas County Schools	1:384	1:915
San Diego Unified District	1:325	1:712

Source: National Center for Education Statistics District Profiles website.

Note: Data for Metropolitan Nashville Public Schools is not available for the 2024-25 school year.

JCPS employs a variety of staff who support student mental and behavioral wellbeing. For counselors and psychologists specifically, JCPS is the only peer district that does not exceed the national recommendation for student to school counselor ratio of 1:250. In contrast, the JCPS student-to-school psychologist ratio is 1:1,942—higher than the recommended 1:500, though all peer districts also exceed the recommended ratio.⁴⁰¹ In Kentucky, JCPS sees better ratios than the state averages with Kentucky’s school counselor ratio at 1:322 and school psychologist ratio at 1:426.

Unlike the school counselors in the District who are based in individual schools and provide day-to-day support to students within that school, school psychologists work at the District level in JCPS and ensure compliance with the IDEA, KAR, and District Exceptional Child Education (ECE) policies and procedures. JCPS also employs 170 mental health practitioners and 13 social workers that are not included in these ratios. School Social workers operate out of Neighborhood Place, which has locations around Louisville at multiple schools and provides families and individuals with access to community-based services.⁴⁰² Like with school counselors, MHPs are based in individual schools. JCPS allocates school counselors based on enrollment at each level as follows for the 2024-25 school year:

- **Elementary Schools** with enrollment less than 660 receive one counselor and those with enrollment greater than 660 receive two.
- **Middle Schools** with enrollment less than 450 receive one counselor, enrollment between 450 and 700 receive two counselors, and those with enrollment greater than 700 receive three counselors.
- **High Schools** follow the same allocations as middle schools. However, those with enrollment between 1,000 and 1,250 receive four counselors, those with enrollment between 1,250 and 2,000 receive five counselors, and those with enrollment greater than 2,000 receive six counselors.

MHPs are staffed using Section 7 funds. These funds are distributed in accordance with 702 KAR 3:246 and are to only be used “for specific instructional purposes based on student needs identified by the board

³⁹⁹ “[Student-to-School-Counselor Ratio 2024–2025](https://www.schoolcounselor.org/getmedia/efe644ea-e26c-4531-82e9-ddbab422227a/24-25-Ratios.pdf).” American School Counselor Association. Retrieved May 5, 2026.

<https://www.schoolcounselor.org/getmedia/efe644ea-e26c-4531-82e9-ddbab422227a/24-25-Ratios.pdf>

⁴⁰⁰ “[School Psychologist State Shortages Data Dashboard](https://www.nasponline.org/about-school-psychology/state-shortages-data-dashboard).” National Association of School Psychologists. Published February 2025. Retrieved August 4, 2025.

<https://www.nasponline.org/about-school-psychology/state-shortages-data-dashboard>

⁴⁰¹ “2024-2025 Active Staff 4.01.2025 Audit.” Jefferson County Public Schools. 2025. [Excel File].

⁴⁰² “[Jefferson County Public Schools Certified School Social Workers](https://schoolsocialworkers.weebly.com/jcps-ssw-contacts.html).” Jefferson County Public Schools. Retrieved March 30, 2026. <https://schoolsocialworkers.weebly.com/jcps-ssw-contacts.html>

from disaggregated student achievement data.” JCPS uses these funds, in part, to provide each elementary, middle, and high school with a MHP for social-emotional support.⁴⁰³

Each school has at least one counselor and mental health practitioner, but schools can opt to prioritize budgeting for additional staff in these roles.

In comparison to peer districts, JCPS allocates a similar share of its operating budget for school support staff. However, differences in how JCPS and its peer districts categorize expenditures limit the comparability of the data, preventing definitive conclusions of spending.

Although JCPS does not meet the nationally recommended student to school psychologist staffing ratios, this discrepancy may be due to how JCPS has implemented its student supports staffing model. JCPS may want to examine funding allocations and staffing levels across schools to ensure that students’ mental and behavioral needs are consistently met.

Recommendation	
8.1.a	JCPS should continue to monitor its student supports staffing model to ensure that students’ mental and behavioral needs are met.

Services

The Student Supports Division provides a variety of both academic and non-instructional supports.

- **Academic supports** are educational services, strategies, and resources that are designed to boost student achievement. At JCPS, these include tutoring, extended learning, and academic counseling.
- **Non-instructional supports** are services in schools that facilitate student well-being, safety, and school operations and allow for academic instruction to go smoothly. These can include school counselors, mental health practitioners, nurses, school safety, and wraparound services. In JCPS, the FRYSCs provide many of these services.

FRYSCs

In compliance with KRS 156.496, Family Resource and Youth Service Centers’ (FRYSC) primary goal is to remove non-academic barriers to learning to enhance student academic success and provide a variety of both academic and non-instructional support services. These centers are focused on schools with the highest percentage of students in need. They are housed in 128 schools and serve a total of 144 schools within JCPS. FRYSCs are staffed with a coordinator responsible for identifying student needs, organizing resources, and conducting community outreach. FRYSCs are primarily funded through the state, with only 16% of their budget funded by JCPS. These centers are managed by JCPS but include state-mandated components, as seen in Figure 114.

FIGURE 114: STATE-MANDATED CORE COMPONENTS FOR FRYSCs

CENTER TYPE	State-Mandated Core Components
Family Resource Centers (FRCs)	• Full-time childcare for two- and three-year olds • After-school childcare for four- through 12-year olds when school is not in session • The Families in Training Program • Family literacy services

⁴⁰³ “[Jefferson County Board of Education FY 2024-25 Allocation Standards](https://budget.jefferson.kyschools.us/2425_Website_Info/JCPS%20Allocation%20Standards%20FY24-25%2001_04_2024.pdf).” Jefferson County Public Schools. January 4, 2024. Retrieved March 30, 2026.
https://budget.jefferson.kyschools.us/2425_Website_Info/JCPS%20Allocation%20Standards%20FY24-25%2001_04_2024.pdf

Youth Service Centers (YSCs)	• Health services and/or referrals to health services
	• Referrals to health and social services
	• Career exploration and development
	• Summer and part-time job development for high school students
	• Substance abuse education and counseling
	• Family crisis and mental health counseling

Source: Jefferson County Public Schools Student Support Services website.

During the 2024-2025 school year, JCPS provided a range of services through these FRYSCs designed to address the varied needs of students and their families. Figure 115 shows these services broken out by category and includes the types of services and interventions, along with the number of services provided between July 2024 and June 2025.

FIGURE 115: NON-INSTRUCTIONAL SUPPORT SERVICES PROVIDED BY JEFFERSON COUNTY PUBLIC SCHOOLS THROUGH FRYSCs IN FY25

SUPPORT SERVICES	Types of Services/Interventions	Number of Services provided
Academic Support Services	• Outreach to assist families with technology • Academic motivation support • Support for students in ECE and English Learner (EL) programs • Preparation for children entering kindergarten • Family-teacher conference facilitation • School enrollment and registration support • Supplying Essential school material supplies • Transition supports to help students move seamlessly between grade levels	336,743
Mental Health / Counseling	• Information and referrals to behavioral health • Anger management support • Bullying support • Emergency and grief and funeral burial resources • Peer relations support • Recovery programs • Social skills support • Substance abuse support • Suicide risk support	111,157
Health Needs	• Information and referrals for Medicaid/insurance • Hygiene • Vision/eyeglasses • Immunizations • Insurance/medication assistance • School physicals • Telehealth assistance • Covid-19 testing location	250,622
Basic Needs	• Referrals and information for food, clothing, shelter, and utility assistance • Free/Reduced lunch assistance • Food pantry maintenance	176,394

	Community partner work to forge relationships and share resources with families	
Other Interventions and Supports	- After-school care and childcare - Attendance - Career development exploration - Phone calls/letters/postcards to ensure student engagement - Referrals to legal aide for housing/eviction issues - Provision of bus tickets - Childcare information - Unemployment information	141,679
Total Non-Instructional Supports Provided		679,852

Source: Jefferson County Public Schools YTD Intervention Graphic – FY25 Interventions.

The services and interventions depicted in Figure 115 aim to provide students with a supportive environment and help remove barriers that might otherwise impede student learning and participation.⁴⁰⁴

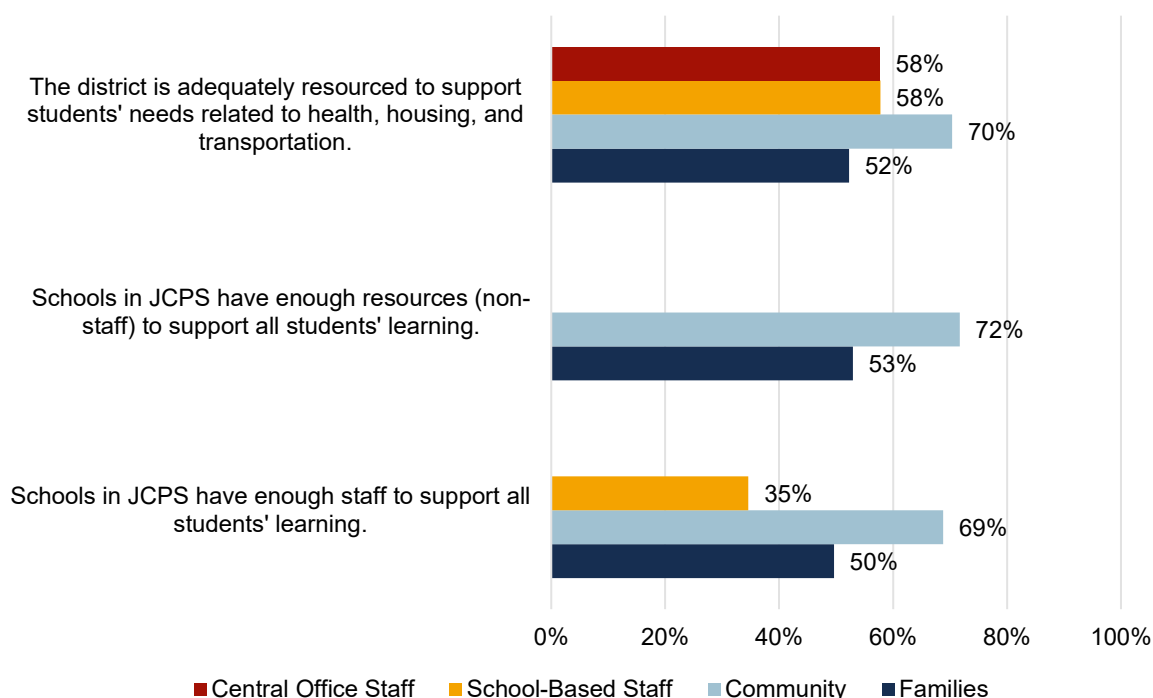
Stakeholder Perceptions on Student Supports

Observation	
8.2	Families and JCPS staff believe the District is insufficiently staffed and resourced to meet student needs.

Figure 116 presents survey responses from school-based staff, community members, and families on their perceptions of JCPS's resources and staffing. Data in Figure 116 is presented when it was collected in the surveys. Since not all stakeholders were asked all questions on support staffing and resources, not all stakeholders are represented in each question. Despite the supports described above, families and staff believe that there are not enough resources and staff are available to support student learning.

⁴⁰⁴ "YTD Intervention Graphic – FY25 July 2024-June 2025 Interventions." Jefferson County Public Schools. Retrieved October 24, 2025. [PDF].

FIGURE 116: STAFF, COMMUNITY, AND FAMILY PERCEPTIONS OF SUPPORT STAFFING AND RESOURCES IN SCHOOLS

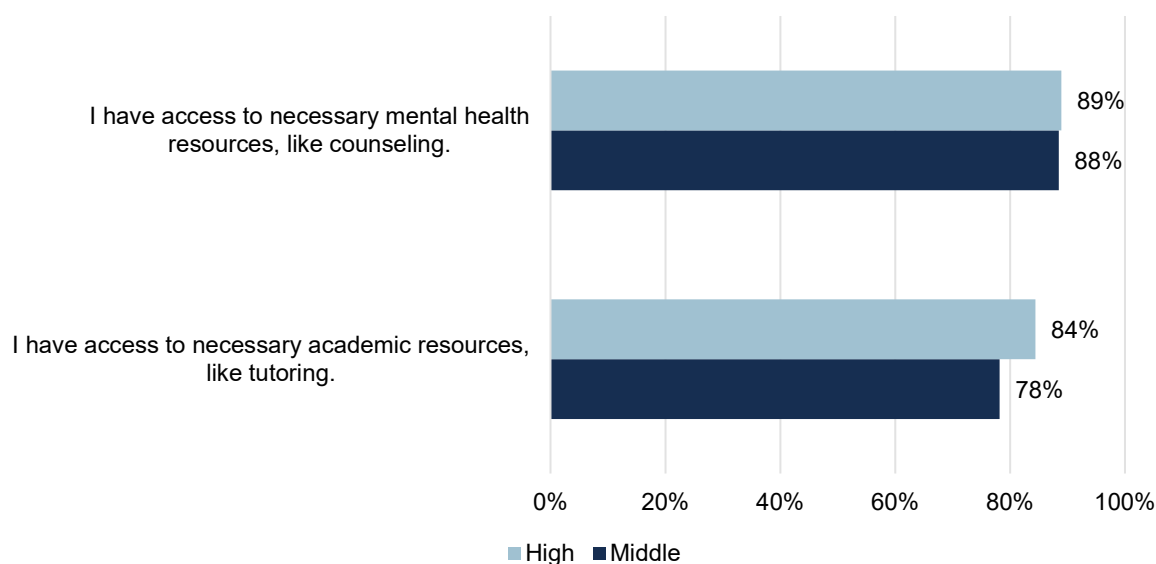


Source: Special Examination Survey.

About half (52%) of all family survey respondents and 58% of JCPS staff agreed that the District is adequately resourced to support students' basic needs. About half of family respondents agreed that schools in JCPS have enough resources and staff to support all students' learning. Even fewer staff (35%) agreed that schools in JCPS have enough staff to support students' learning, which was the lowest level of agreement seen across all questions and stakeholders in the exam surveys. These sentiments were echoed in family focus groups, which highlighted necessity for increased staffing and resources to enhance learning environments and provide comprehensive support to students. Specifically, families cited concern that students, especially those with special needs, are not getting the support they need. They also suggested a need for robust mental health resources and expressed a desire for required check-ins with counselors and mental health practitioners for all students. Additional staffing data and analysis can be found in **Chapter 5: Human Resources**.

Figure 117 presents students' perspectives on their access to academic resources, such as tutoring and mental health resources (e.g., counseling).

FIGURE 117: STUDENT PERCEPTIONS OF ACADEMIC AND MENTAL HEALTH RESOURCES



Source: Special Examination Survey.

Almost 90% of high school and middle school students agreed that they have access to necessary mental health resources while 84% of high school students and 78% of middle school students agreed that they have access to necessary academic resources.

JCPS seeks to understand its climate and culture through the annual Comprehensive School Survey (CSS), which has been conducted since the 1996-97 school year. With participation from employees, parents, and students in grades four and above, the survey has generated over 80,000 responses each year since 2023. The District uses these results to shape strategy conversations and strengthen school culture.⁴⁰⁵

These survey results are supported by both Comprehensive School Survey (CSS) and focus group data. The CSS in 2025 revealed that around 80% of students across grade levels were aware of available help for behavioral issues, and nearly 85% of high school students agreed they can talk with their school counselor — a number that has steadily increased over the past three years.⁴⁰⁶ In focus groups, stakeholders consistently pointed to school counselors and collaboration with community organizations as key strengths of JCPS's non-instructional supports.

In focus groups and survey responses, family and school-based staff stakeholders highlighted ongoing staffing shortages and the need for enhanced behavior management and mental health support. In terms of staffing shortages, staff cited an overall lack of support staff, which led to staff having increased workloads and feelings of burnout. Stakeholders who discussed the need for enhanced behavior management highlighted a desire for more rigorous discipline measures and uniformly enforced policies. Those who expressed a greater need for mental health supports suggested that, despite District efforts to support mental health, demand still exceeds their current capacity and increased supports are necessary to meet the mental health needs throughout the District.

⁴⁰⁵ "Research & Systems Improvement – Comprehensive School Survey." Jefferson County Public Schools.

Retrieved December 17, 2025. <https://www.jefferson.kyschools.us/page/research-and-systems-improvement>

⁴⁰⁶ "JCPS Comprehensive School Survey." Jefferson County Public Schools. Published 2025. Retrieved December 12, 2025. <https://sites.google.com/jefferson.kyschools.us/jcps-css/home>

Recommendation	
8.2.a	JCPS should analyze student support staffing levels in relation to vacancies, available funding, and staff and family perceptions to plan for future hiring needs in this area.

THIRD-PARTY TUTORING PROGRAMS

General Administration of Programs

Findings	
8.3	Knowledge of JCPS tutoring programs by key leadership was incomplete and disjointed, as multiple interviews across different divisions were required to obtain a full scope of JCPS's tutoring programs and contracts. JCPS has not placed the responsibility of administering and monitoring third-party tutoring programs within a singular division. Instead, these programs are administered by various divisions or individuals. Such disbursement of responsibility increases the difficulty by which programs can be administered, monitored, and evaluated in a consistent manner.
8.4	There is no documented and intentional process or procedure by JCPS to advertise the various tutoring programs offered to students, other than relying on word-of-mouth from classroom teachers. In addition, JCPS's website does not list all available tutoring services and still lists third-party tutoring vendors for which JCPS no longer has active contracts, including one that is no longer in business.
8.5	Contracts and other agreements with the third-party tutoring providers do not require the provision of student performance metrics regarding the use of each program. In addition, JCPS does not appear to be tracking or collecting performance data across the district and has not established a set rubric for scoring the outcomes and quality of third-party tutoring resource usage.

JCPS offered various tutoring opportunities for students during the examination period, including through third-party vendors. Specifically, JCPS contracted with five vendors to provide third-party tutoring services: Paper, CERT, IXL, FEV Tutor, and Kumon Learning Centers through the Louisville Urban League. JCPS also sponsors two Elev8 Student Learning Centers, located in West Louisville and in the Newburg area.⁴⁰⁷ JCPS's Schools Division and Academics Division are primarily responsible for administering third-party tutoring programs; however, one contract is administered by an individual in the Diversity, Equity, and Poverty Division.⁴⁰⁸

Advertising of Available Programs

Although tutoring programs are available on JCPS's digital platform — Clever — there is no overall method to advertise those available to JCPS students. Students are left to learn about them from teachers.⁴⁰⁹ Aside from an initial districtwide promotion of the Paper tutoring program, principals are responsible for getting the message out at their schools about Paper and CERT. Similarly, IXL was typically communicated to families by the teacher sending home information about the program.

The Homework Help & Tutoring page of the JCPS website listed two tutoring vendors offering assistance to students as of May 2026: FEV Tutor and Paper.⁴¹⁰ While only two of the five third-party tutoring vendors contracted during the examination period were listed on JCPS's website as of May 2026, the contracts with

⁴⁰⁷ "Student Support Services." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴⁰⁸ "Overview of Third-Party Tutoring Administration." Jefferson County Public Schools. Retrieved June 3, 2026. [Microsoft Word].

⁴⁰⁹ "Homework Help & Tutoring May 2026." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴¹⁰ Ibid.

FEV Tutor and Paper ended in August 2024 and April 2026, respectively.⁴¹¹ Additionally, FEV Tutor has since gone out of business.⁴¹² JCPS's website has not been updated to reflect these changes.

Contracting Process

Schools often initiate the contract process by contacting their assistant superintendent when they hear of or are presented with an opportunity to implement a service for students. If the assistant superintendent approves, the decision then moves to the district level for consideration. During the examination period, an individual in the Academics Division reviewed potential tutoring contracts using a questionnaire that included determining whether the service would serve an unmet need or be duplicative. A contract would then go to the General Counsel for legal review. Additionally, if there is a technology component, the decision is reviewed by the Technology Division before being sent to the Chief of Academics or the Chief of Schools for review. If a contract comes to the Chief of Schools with an issue highlighted by one of the three divisions that has reviewed it, it is sent back to the requesting school or assistant superintendent, who is asked to provide a rebuttal. Any potential contract using a digital platform must also include a Data Privacy Agreement (DPA) to protect personally identifiable student information and other regulated data to be exchanged with the vendor.⁴¹³

In Fall 2025, the Request for Proposal (RFP) and DPA processes became more rigorous, including the addition of return-on-investment language and guidance on measuring program effectiveness. Questions have also been added to the process to ensure the selected service will benefit students. Another newly implemented process is obtaining financial approval before the legal review.

Contract Deliverables & Program Evaluation Process

The exam team reviewed all available service contracts, DPAs, and Data Sharing Agreements in effect during the examination period for the five third-party tutoring programs. The lack of a single unit with administrative and oversight control of these programs made not only the collection of these documents cumbersome, but also was likely a contributing factor to the variety and state of documents provided for review. Some documents provided were unsigned, and some timeframes from the examination period were not represented.⁴¹⁴

In addition, the extent of monitoring outcomes or return on investment in the tutoring programs, whether by third-party vendors or by JCPS, varied. These monitoring activities typically occurred only in the offices of schools that used a particular tutoring resource, as information regarding student assessment scores before and after implementing tutoring programs is not reported to the District by schools. Some vendors provided data to the District on their own. IXL provided analytics for student learning.⁴¹⁵ Paper provided a usage report. However, the APA found no deliverables, reports, or analyses required in contracts concerning performance. The lone exception was a requirement for FEV Tutor to produce weekly reports of district data accessible via a dashboard in the District's original 2021 contract with FEV Tutor.⁴¹⁶

The District can also examine usage numbers for some tutoring programs, which can help inform decisions on program effectiveness. The District itself reviews Paper and CERT utilization, with the Chief of Schools specifically reviewing the Paper usage report with high school or middle school principals' supervisors, who

⁴¹¹ "Homework Help & Tutoring May 2026." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴¹² "FEV Tutor Shuts Down: How Online Tutoring Companies Can Fill the Gap. GovSpend. Retrieved June 3, 2026. [PDF].

⁴¹³ "Standard Jefferson County Public Schools Data Privacy Agreement." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴¹⁴ "Analysis of Tutoring Program Contracts at JCPS." Jefferson County Public Schools. Retrieved June 3, 2026. [Microsoft Word].

⁴¹⁵ "Second Amendment to Contract for Procurement of Professional Services." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴¹⁶ "Analysis of Tutoring Program Contracts at JCPS." Jefferson County Public Schools. Retrieved June 3, 2026. [Microsoft Word].

then work with the principals. According to JCPS staff, there is constant collaboration with the Academics Division to analyze data, as well as with the Accountability Research and School Improvement Department, which assists the Division in acquiring and interpreting data.

Leadership informed the APA that JCPS was transitioning away from professional service contracts to RFPs, in which the District could set criteria and require vendors to answer questions and meet those criteria. Vendors would be graded on their ability to meet student needs, the services they provide, and whether they are student, teacher, or leadership-based. The District also intends to monitor return on investment more closely, as JCPS lacks a robust process for analyzing return-on-investment data.

Student-to-Program Ratio & Program Effectiveness

Schools Division personnel noted that the adequacy of the student-to-program ratio depends on the data and the purpose of the tutoring service. It was reported by staff that much of the tutoring program use is limited to low-performing students and students on track for career-technical fields. While personnel indicated tutoring programs were being used appropriately and efficiently for students who needed them, they shared that they could be used more for students on the cusp.

According to Schools Division personnel, JCPS needs a better evaluation tool to determine each tutoring program's effectiveness, as it lacks a set rubric for scoring the quality of tutoring resource use and a clear, standardized measurement tool for best practices. Though the effectiveness of CERT is evidenced through SAT scores, other tutoring programs, such as Paper, are too broad to measure.

Recommendations	
8.3.a	JCPS should consider either placing all responsibilities regarding third-party and JCPS-sponsored tutoring programs within a single division or implementing consistent administration, monitoring, and evaluation methods across all programs.
8.4.a	JCPS should develop an accessible system to advertise the various tutoring programs available to students, in addition to sharing the information through current communication channels. JCPS should also regularly update its website so current information about tutoring options available in the district is shared with students and their families.
8.5.a	JCPS staff who administer and monitor these tutoring programs should work together to develop a rubric to score the quality of outcomes for each program and a clear, standardized measurement tool to aid in assessing the value of each program. Staff assigned to these tasks should also conduct periodic cost-benefit analyses to determine if contracts and agreements should be extended beyond the initial period.

Tutoring Options Across the District

Paper

Paper was introduced in 2022 during the COVID-19 pandemic to address learning loss and is primarily an online tutoring service. As the District emerged from COVID-19, an individual assigned to JCPS came in and supported schools using Paper.⁴¹⁷ The total spent on the Paper tutoring contract in FY23, FY24, and FY25 totaled \$4,955,000, as shown in Figure 118.

⁴¹⁷ "Tutoring Services Help Students Level-Up Their Learning." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

FIGURE 118: PAPER SPENDING FOR FY23, FY24, AND FY25

FISCAL YEAR	Amount
2023	\$3,940,000
2024	\$0
2025	\$1,015,000
Total	\$4,955,000

Source: APA, based on data and information provided by JCPS.

As shown in Figure 119, there were 28,158 total engaged students and 24,726 total on-demand engaged users of Paper between the 2022-23 and 2024-25 school years.

FIGURE 119: PAPER USAGE DATA, 2022-23 TO 2024-25 ACADEMIC YEARS

ACADEMIC YEAR	Engaged Students	Engagement Percentage	On-Demand Engaged Users
2022-23	8,406	13%	8,277
2023-24	7,810	12%	7,195
2024-25	11,942	17%	9,254
Total	28,158	-	24,726

Source: APA, based on data and information provided by JCPS.

Although Paper was initially intended for Kindergarten through 12th-grade students, including during the examination period, it was scaled back in 2025 to 6th through 12th-grade students only, where higher usage was observed. This contract subsequently ended in April 2026.

CERT

The CERT DPA commenced on July 1, 2023, and is intended primarily for high school students.⁴¹⁸ Initially, CERT was specifically for ACT preparation but has since shifted to preparing high school students for the SAT, which provides another accountability metric for high schools. Additionally, Figure 120 outlines JCPS's spending amounts for CERT, which increased each fiscal year from \$122,268 in FY23 to \$702,484 in FY25.

FIGURE 120: CERT SPENDING FOR FY23, FY24, AND FY25

FISCAL YEAR	Amount
2023	\$122,268
2024	\$427,962
2025	\$702,484
Total	\$1,252,714

Source: APA, based on data and information provided by JCPS.

While a breakdown of the number of students using CERT during FY23, FY24, and FY25 was requested, only CERT usage data for two high schools for the 2022-2023 school year were provided, along with the number of JCPS students tested and completing at least one section during the 2025-26 school year, which totaled 14,544.⁴¹⁹ Figure 121 provides a breakdown of the number of students using CERT at those two high schools in the 2022-23 school year, along with their total activity hours.

⁴¹⁸ "Recommendation for Approval of Data Privacy Agreement with ePrep, Inc." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴¹⁹ "22-23 CERT Tutoring Usage." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "Tutoring Program Requests – Robert Moore 03-25-2026." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "CERT JCPS Completion 2025-26." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

FIGURE 121: CERT USAGE DATA, 2022-23 SCHOOL YEAR

SCHOOL YEAR	Number of Students	Total Activity Hours
Eastern High School	16	63
Louisville Male High School	377	1,749
Totals	393	1,812

Source: APA, based on data and information provided by JCPS.

IXL

IXL is an online platform for literacy and math that students can join at any time, either at home or in class, including in small groups. Student materials are tailored to each student's academic level in literacy and math. As outlined in Figure 122, JCPS's spending amounts on IXL fluctuated throughout the examination period, ranging from \$351,782 in FY24 to \$250,464 in FY25.

FIGURE 122: IXL SPENDING FOR FY23, FY24, AND FY25

FISCAL YEAR	Amount
2023	\$316,751
2024	\$351,782
2025	\$250,464
Total	\$918,997

Source: APA, based on data and information provided by JCPS.

The JCPS Schools Division initiated and administered the IXL DPA. Neither the Schools Division nor the Academics Division had a centralized monitoring or usage-tracking mechanism in place for IXL, as assistant superintendents and executive administrators deferred to individual schools on whether to use IXL and how to assess its effectiveness. The IXL DPA was effective March 29, 2023, and terminated on March 28, 2026, and was not renewed.⁴²⁰

FEV Tutor

FEV Tutor was introduced to address learning loss caused by the COVID-19 pandemic. The online platform focused on the core subjects of math, English, science, and social studies for students in grades 3 through 12.⁴²¹ FEV Tutor's contract was effective October 28, 2020, and the districtwide purchase ended on August 15, 2024. While one school purchased licenses for September 24, 2024, to September 23, 2025, FEV Tutor went out of business before the end of the term.⁴²² Figure 123 outlines the total amount paid to FEV Tutor between FY23 and FY25, totaling \$6,854,000, which includes the one school's purchase of licenses in FY25.

FIGURE 123: FEV TUTORING SPENDING FOR FY23, FY24, AND FY25

FISCAL YEAR	Amount
2023	\$3,400,000
2024	\$3,400,000
2025	\$54,000
Total	\$6,854,000

Source: APA, based on data and information provided by JCPS.

Note: The tutor spending in FY25 reflects purchase of licenses by one school in Jefferson County Public Schools.

⁴²⁰ "Recommendation for Approval of Data Privacy Agreement with IXL Learning." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴²¹ "Tutoring Services Help Students Level-Up Their Learning." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴²² "Recommendation for Approval of Data Sharing Agreement with FEV Tutor Inc." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

As shown in Figure 124, the number of school sites using FEV Tutor, the number of students served, and the number of live one-on-one sessions delivered increased between the 2021-22 and 2022-23 school years.

FIGURE 124: FEV TUTOR USAGE DATA, 2021-22 AND 2022-23 SCHOOL YEARS

SCHOOL YEAR	Number of School Sites Using FEV Tutor	Number of Students Served	Number of Live 1:1 Sessions Delivered
2021-22	144	8,500+	122,355+
2022-23	150	8,953	208,000+

Source: APA, based on data and information provided by JCPS.

Tutoring sessions totaled 28,642 in the 2020-21 school year, but increased to 208,000 in the 2022-23 school year, and the planned sessions for the 2023-24 school year were 200,000, as shown in Figure 125.

FIGURE 125: FEV TUTOR SESSIONS, 2020-21 TO 2023-24 SCHOOL YEARS

SCHOOL YEAR	Tutoring Sessions
2020-21	28,642
2021-22	122,355
2022-23	208,000
2023-24	200,000+

Source: APA, based on data and information provided by JCPS.

Note: Tutoring sessions were planned for 2023-24 school year.

Figure 126 presents the NWEA Measures of Academic Progress (MAP) score growth for non-participant, FEV Tutor participants, and FEV Tutor champions between the winter-to-spring of the 2021-22 school year and the fall-to-winter of the 2023-24 school year.⁴²³

FIGURE 126: FEV TUTOR MATHEMATICS AND READING NWEA MAP SCORE GROWTH, 2021-22 TO 2023-24 SCHOOL YEARS

SCHOOL YEAR	Non-Participant	FEV Tutor Participants	FEV Tutor Champions
Mathematics			
Winter-to-Spring 2021-2022	3.2	4.5	5.7
Fall-to-Winter 2022-2023	3.8	4.8	6.0
Fall-to-Winter 2023-2024	3.8	3.9	5.7
Reading			
Winter-to-Spring 2021-2022	2.7	4.2	4.7
Fall-to-Winter 2022-2023	3.2	4.3	4.6
Fall-to-Winter 2023-2024	3.3	4.4	4.9

Source: APA, based on data and information provided by JCPS.

Kumon Learning Centers through the Louisville Urban League

JCPS contracted with the Louisville Urban League (LUL) on September 1, 2021, to work together to provide targeted, comprehensive support to disadvantaged JCPS students through the LUL's Street Academy program, offering intensive tutoring, social and emotional support, college and career readiness, and standardized test prep.⁴²⁴ The LUL offers tutoring through its partnerships with Kumon Learning Centers

⁴²³ "NWEA and MAP Frequently Asked Questions." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴²⁴ Memorandum of Agreement Between Jefferson County Board of Education and Louisville Urban League." Jefferson County Public School. Retrieved June 3, 2026. [PDF].; "Louisville Urban League Street Academy Contract 3.2." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].; "Louisville Urban League 2025 Contract." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

(Kumon) and Equitas Prep.⁴²⁵ Additionally, the LUL works with JCPS's Diversity, Equity, and Poverty Division to recruit students and families to participate in the program.⁴²⁶

While the LUL partners with Kumon to offer tutoring, it is on a school-by-school basis rather than Districtwide, and some schools lack the funding to make use of this resource. As a result, many of JCPS's comprehensive support and improvement schools use Kumon, as they can use school improvement funds to pay for the resource.⁴²⁷ Figure 127 outlines payments to the LUL for Kumon, totaling more than \$7 million from FY23 to FY25.

FIGURE 127: LUL SPENDING FOR FY23, FY24, AND FY25

FISCAL YEAR	Amount
2023	\$709,618
2024	\$438,521
2025	\$6,000,000
Total	\$7,148,139

Source: APA, based on data and information provided by JCPS.

While JCPS did not provide usage data for Kumon tutoring through the LUL partnership, enrollment, participation, and engagement data were provided for one quarter in 2022, three quarters in 2023, and one quarter in 2024 and 2025, as presented in Figure 128.

FIGURE 128: KUMON QUARTERLY PARTICIPATION PROGRAM REFLECTION DATA

QUARTER	Intensive Tutoring Enrollment	Monthly Participation Average	Parent Engagement Average
October – December 2022	459	83%	98%
January – March 2023	548	85%	98%
April – June 2023	516	83%	98%
July – September 2023	554	83%	90%
January – March 2024	527	69%	86%
January – March 2025	390	69%	94%

Source: APA, based on data and information provided by JCPS.

Elev8 Student Learning Centers

In addition to the third-party vendor tutoring programs, JCPS sponsors the Elev8 Student Learning Centers, which provides evening services for recommended JCPS students.⁴²⁸ JCPS-certified teachers staff the two learning centers and provide additional academic instruction, targeted tutoring, college and career support, and enrichment opportunities for eligible students.⁴²⁹ Students must meet certain criteria to be eligible for a referral to one of the Elev8 Student Learning Centers. Such criteria include not meeting Reading or Math (MAP) benchmarks, missing ten or more days of school, failing three or more classes for older students, and residing in the specified zip codes. However, no data were provided to the Chief of Schools regarding the effectiveness of the Elev8 learning centers.

⁴²⁵ "Youth Education Programs." Louisville Urban League. Retrieved June 3, 2026. <https://lul.org/education/>

⁴²⁶ "Louisville Urban League Street Academy Racial Equity Analysis Protocol." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴²⁷ "Youth Education Programs." Louisville Urban League. Retrieved June 3, 2026. <https://lul.org/education/>

⁴²⁸ "Student Support Services." Jefferson County Public Schools. Retrieved June 3, 2026. [PDF].

⁴²⁹ Ibid.

FAMILY AND COMMUNITY ENGAGEMENT, PARTNERSHIPS, AND RESOURCES

JCPS engages partners in a decentralized structure across schools and Central Office divisions. The Student Supports Services Division oversees some of these family and community partnerships and support services. Community engagement and partnership development are discussed in greater detail in both **Chapter 1: District Leadership & Strategy** and **Chapter 14: College & Career Readiness**.

Family Engagement

Research has shown that when families and schools collaborate, students experience improved identification of their needs, enhanced social and emotional development, higher attendance, stronger academic performance, fewer suspensions, increased graduation rates, and better preparation for college and careers. The positive impact extends beyond students:

- Educators have greater job satisfaction and are able to better engage students;
- Families build stronger relationships with their children and their educators;
- Schools benefit from improved morale and climate; and
- School districts, along with communities, become safer, more supportive environments with increased youth and family participation.

Ongoing, collaborative partnerships between families, schools, and communities help maximize learning and development outcomes.^{430 431}

Observation	
8.6	Not all School-Based Decision Making Councils are in compliance with KRS 160.345.

Family engagement at JCPS is shaped by both policy and practice, with KRS 160.345 mandating parental inclusion in School-Based Decision Making (SBDM) Councils. All SBDM members are required to complete training at the beginning of the school year. SBDM councils are required to have two parent members, three teacher members, and one principal or administrator member. Teachers and parents are elected by their respective peers through processes determined by each school, ensuring a democratic approach to representation.⁴³²

The exam team reviewed SBDM meeting minutes for each school for the 2025-26 school year (from July 2025 through March 2026). Through this review, it was determined that all schools reference KRS 160.345 in both their meeting minutes and their SBDM policies, but not all schools had two parents consistently attending SBDM council meetings during the time period reviewed by the exam team.⁴³³ The exam team could not assess whether these schools requested a waiver for alternative membership. Figure 129 shows the breakdown of parent membership for the 131 schools with minutes published online for the 2025-26 school year. Notably, 22 schools (or 17% of SBDMs) had one or no parent representative present at meetings from July 2025 and March 2026.

⁴³⁰ Ross, Elizabeth. "[The Case for Strong Family and Community Engagement in Schools](https://www.gse.harvard.edu/ideas/usable-knowledge/23/03/case-strong-family-and-community-engagement-schools)." Harvard Graduate School of Education. Published March 21, 2023. Retrieved February 13, 2026. <https://www.gse.harvard.edu/ideas/usable-knowledge/23/03/case-strong-family-and-community-engagement-schools>

⁴³¹ "[Parent Involvement and Family Engagement](https://www.cde.ca.gov/ls/pf/pf/index.asp)." California Department of Education. Published December 1, 2025. Retrieved February 13, 2026. <https://www.cde.ca.gov/ls/pf/pf/index.asp>

⁴³² "[School-Based Decision Making 2025-26](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/20269623-5ec5-4695-b2fe-3ceba3e03958/FAQSBDMFlier.pdf?disposition=inline)." Jefferson County Public Schools. Retrieved February 3, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/20269623-5ec5-4695-b2fe-3ceba3e03958/FAQSBDMFlier.pdf?disposition=inline

⁴³³ "[SBDM Minutes \(School\): Minutes](https://docs.google.com/spreadsheets/d/e/2PACX-1vRGNwZ76L9MgqpOS7T-VsGsg-XUfejBAZMwVNAH06dJ07Gm_FaXM9MZivye0KHpJhJzKStKE5nMbxXV/pubhtml?gid=1804653606&single=true)." Jefferson County Public Schools. Retrieved February 3, 2026. https://docs.google.com/spreadsheets/d/e/2PACX-1vRGNwZ76L9MgqpOS7T-VsGsg-XUfejBAZMwVNAH06dJ07Gm_FaXM9MZivye0KHpJhJzKStKE5nMbxXV/pubhtml?gid=1804653606&single=true

FIGURE 129: SBDM PARENT MEMBERSHIP ATTENDANCE STATUS, 2025-26 SCHOOL YEAR

PARENT STATUS	Parent Status Definition	Number of Schools	Percent of Schools with SBDMs
Does not meet 2 parent requirement	Zero to one parent present at meetings during the time period reviewed	22	17%
Lists two parents on minutes, but only 1 parent attends meetings	Either (1) only one parent in attendance or (2) two parent representatives in attendance at one meeting at the start of the year and only one attended meetings afterwards	5	4%
Meets 2 parent requirement	Explicitly states two parent representatives attended meetings regularly during the time period reviewed	61	47%
Roles not explicitly stated	School did not define roles of members in any meeting minutes for the time period reviewed	43	33%

Source: Jefferson County Public Schools School-Based Decision-Making Minutes website.

Recommendation	
8.6.a	JCPS should ensure all SBDMs meet the required parent participation guidelines. Review membership data for SBDMs to see which schools struggle to attract parent representatives and meet with principals to develop recruitment strategies.

Community Partnerships & Support Services

The JCPS Student Supports Division has cultivated an extensive network of partnerships with external organizations to support at-risk and diverse student populations. These partner collaborations are intended to increase equitable access to educational resources and opportunities for students and families.

A variety of programs operate through these partnerships. For example:

- After-school and extended-day services are provided in collaboration with the YMCA, which offers before- and after-school care as well as snow day coverage.
- Local community organizations enrich student experiences with activities ranging from dance and chess to cooking and financial literacy.
- Seasonal camps, including “Literacy &” camps and Success League-style summer offerings, engage students during school breaks with literacy-focused and themed day programs requested by individual schools.

Stakeholders across focus groups noted transportation barriers, particularly when programs are held at off-site or centralized locations, hinder student and family participation in partner programs. Students cited transportation as the top barrier to participating in events and extracurriculars after school in the exam survey.

Observation	
8.7	JCPS does not use robust data collection, analysis, or reporting of outcomes for students served through the Community Support Services programs.

JCPS Community Support Services coordinates partnerships with organizations to offer students and their families several academic and non-academic assistance services, along with wraparound services, which are services that aim to remove barriers to learning and support the whole student (e.g., counseling, on-campus food pantries, health resources). These supports help meet basic needs and provide services that aim to make it easier for students to stay in school and graduate. The Office of Community Support Services consists of: AmeriCorps REACH Corps, Neighborhood Place, Build-a-Bed, and student support programming. Details on these supports are included in Figure 130. AmeriCorps REACH Corps and Home School Coordinators are a part of JCPS's dropout prevention and reengagement strategies and are discussed in greater detail in that section.

FIGURE 130: COMMUNITY SUPPORT SERVICES INTERVENTION DESCRIPTION AND TRACKING

INTERVENTION	Description	Tracking
AmeriCorps REACH Corps	Early intervention program where a caring adult assists, supports, encourages, and mentors students who have patterns of excessive unexcused absences. (Discussed in greater detail in Dropout Prevention and Re-Engagement .)	ARSI tracks behavior and chronic absenteeism to identify students who may benefit from these services and track participating students' progress.
Neighborhood Place	Partnership involving public-sector agencies that brings essential health, education, employment, and human services directly to children and families. Each partner agency provides its own funding and collects its own data. ⁴³⁴ It is accessible to Jefferson County residents with eight locations across the county. Coordinators act as liaisons between families and their local community centers. They promote student success and family self-sufficiency by connecting families to resources, organizing events like back-to-school kickoffs and health fairs, and leading group sessions on topics such as attendance, self-esteem, parenting, and conflict resolution. ⁴³⁵	JCPS does not have a publicly available dashboard that shows data on services provided. Data is tracked through the Louisville Metro Government.
Build-a-Bed	Brings together local organizations to construct and deliver beds along with mattresses, bedding, stuffed animals, books, and toothbrushes to JCPS students in need. ⁴³⁶	The Student Support Services Division tracks number of beds built and discusses benefits to having a bed but does not appear to formally track metrics such as attendance, academic achievement, or sense of

⁴³⁴ Morrison, Carly and Jen, Jeffrey. "[Understanding the Value of Centralized Services: Neighborhood Place](#)." MEF Associates. Published September 2022. Retrieved February 17, 2026.

https://acf.gov/sites/default/files/documents/opre/vocs_site_brief_neighborhood_place_jan2023.pdf

⁴³⁵ "[Student Support Services](#)." Jefferson County Public Schools. Retrieved December 18, 2025. <https://www.jefferson.kyschools.us/page/student-support-services>

			belonging for students served through this program.
Home School Coordinators	Safety net program for targeted high school students who are at-risk of dropping out. Staff help develop self-esteem, raise academic performance, and encourage parent involvement. (Discussed in greater detail in Dropout Prevention and Re-Engagement.)		ARSI tracks behavior and chronic absenteeism to identify students who may benefit from these services and track participating students' progress.

Source: Jefferson County Public Schools Student Support Services website.

Stakeholders referenced challenges associated with understanding the impact of these programs. As seen in Figure 130, JCPS tracks some metrics associated with these programs but is not using the data to measure or understand impact. To better understand the impact of these programs, JCPS may benefit from:

- Identifying additional metrics to collect
- Coordinating data sharing and transparency with partners
- Analyzing short-and long-term outcomes for students served
- Developing transparent dashboards or reports

By conducting this analysis and outcomes reporting, JCPS may be better positioned to scale and promote programs shown to have a positive impact.

Recommendation	
8.7.a	JCPS should develop robust data practices for improved tracking and public reporting of outcomes data and impact for all Community Support Services programs administered with partner organizations.

SCHOOL CULTURE AND CLIMATE

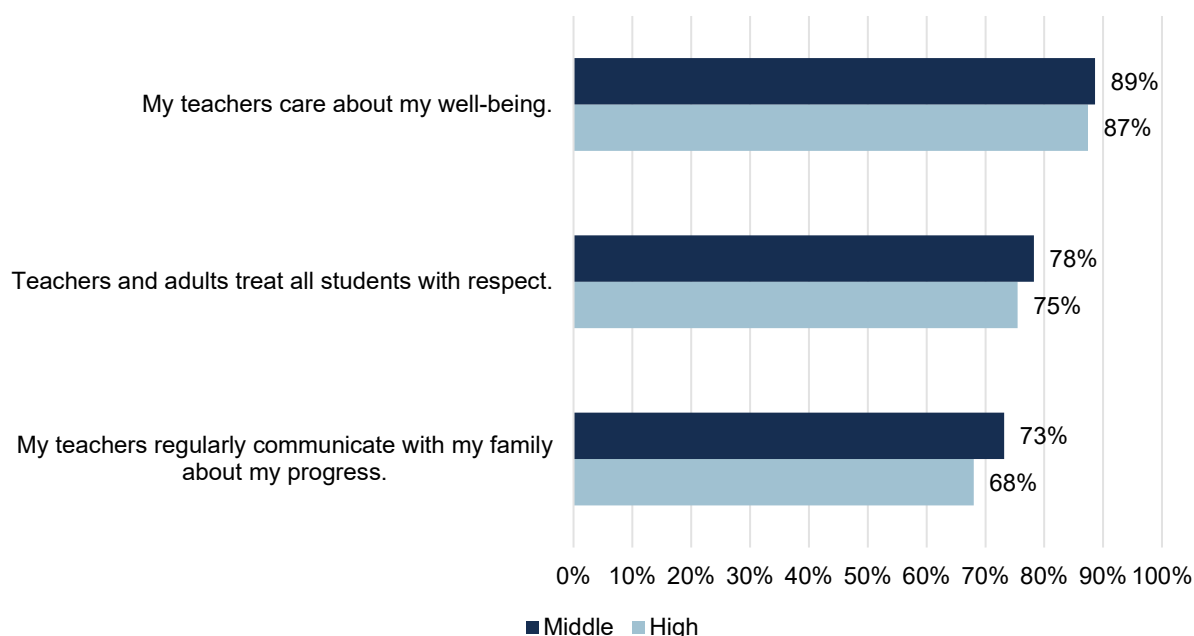
The Culture and Climate Division aims to empower educators to build healthy, caring, and equitable cultures and learning environments. The Division focuses on improving school culture, increasing engagement, and fostering relationships to help educators develop relationships with students and families to support more personalized learning experiences and a stronger sense of belonging.

The Division houses areas including bullying prevention, social-emotional learning, multi-tiered systems of support (MTSS), juvenile court relations, violence prevention, student relations, pupil personnel, and behavior systems.⁴³⁷ MTSS is discussed in more detail in **Chapter 9: Curriculum & Instruction**.

Figure 131 shows how students responded to exam survey questions related to interactions with adults in their school communities.

⁴³⁷ "JCPS Organizational Chart." Jefferson County Public Schools. Published July 1, 2023. Retrieved December 17, 2025. https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/4298/JCPS/4069321/Organizational_Chart.pdf

FIGURE 131: STUDENTS PERCEPTIONS OF SCHOOL CULTURE, TEACHER RESPECT, AND COMMUNICATION



Source: Special Examination Survey.

Nearly 90% of student respondents reported that their teachers care about their well-being, reflecting a supportive and nurturing atmosphere in the classroom. Additionally, more than three-quarters of students agreed that teachers and adults consistently treat students with respect, fostering an inclusive and positive climate for learning. Efforts to maintain open lines of communication are evident, with close to or over 70% of students noting that teachers regularly communicate with their families about their progress.

The CSS results reveal continued progress at the middle and high school level in several key areas as seen in Figure 132. Responses at the elementary level have not shown similar gains.

FIGURE 132: STUDENT CSS RESULTS ON CULTURE & CLIMATE QUESTIONS

QUESTION	Group	2022	2023	2024	2025
I think school is fun.	High School	52%	49%	53%	58%
	Middle School	54%	51%	51%	55%
	Elementary School	72%	69%	68%	69%
I enjoy going to school.	High School	51%	48%	52%	55%
	Middle School	53%	48%	48%	51%
	Elementary School	69%	66%	64%	64%
I feel that I belong in my school.	High School	71%	72%	77%	80%
	Middle School	75%	74%	77%	81%
	Elementary School	85%	83%	84%	86%
I feel like I am part of my school community.	High School	66%	68%	73%	77%
	Middle School	75%	74%	78%	82%

	Elementary School	86%	85%	85%	87%
I feel my teachers really care about me.	High School	83%	80%	85%	87%
	Middle School	81%	79%	81%	85%
	Elementary School	91%	90%	90%	91%

Source: Jefferson County Public Schools Comprehensive School Survey.

While levels of agreement on the culture and climate statements in Figure 132 vary by item and school level, results have generally increased over time or remained relatively stable. Across school levels, only about half of students report that school is fun or that they enjoy going to school, with decreased agreement shown amongst elementary school students. In contrast, students report the strongest agreement with “I feel my teacher really cares about me,” with agreement ranging from 80-90%. This response rate is consistent with the exam student survey results shown in Figure 131, where a large majority of students indicate that teachers care about their well-being.

Board Cell Phone Policy

Observation	
8.8	In the first year of the cell phone policy, stakeholders had mixed opinions on the consistency of implementation across schools and student accessibility.

During the 2025 legislative session, Kentucky passed House Bill 208, which required local boards of education to adopt a policy that prohibits student use of personal telecommunication devices during instructional time. Similar policies nationally have shown to have a positive impact on school culture and climate and increased student achievement.⁴³⁸

As a result of 2025 House Bill 208, JCBE adopted Telecommunication Devices Policy 09.4261 on May 13, 2025, to prohibit cell phone use throughout the school day, including during lunch and transitions.⁴³⁹ In April 2025, District leadership suggested a policy that was developed in collaboration with principals, the Jefferson County Teachers Association (JCTA), and students that prohibited cell phone use during instructional time but gave schools the discretion to decide about usage in hallways and the cafeteria. The Board did not vote to adopt that policy and opted for the complete ban due to concerns about enforceability and impact.⁴⁴⁰

Overall, 90% of school-based staff survey respondents agreed the implementation of this new cell phone policy has gone smoothly at their school. In stakeholder engagement, teachers and staff generally supported the ban and noted its help reducing in-class distractions. However, they did cite two challenges:

⁴³⁸ Diliberti, Melissa Kay, Schwartz, Heather L., Moore, Pauline., and Jackson, Brian A. “[Principals See Many Benefits of Cell Phone Policies, but Youth Remain Skeptical](#).” RAND Corporation. Published October 7, 2025. Retrieved February 10, 2026. https://www.rand.org/pubs/research_reports/RRA3988-2.html; Pressley, Tim, and Marshall, David T. “[Banning Smartphone in Schools: Review of the Literature Shows Positive Impact](#).” Paragon Health Institute. Published January 5, 2026. Retrieved February 10, 2026. <https://paragoninstitute.org/public-health/banning-smartphones-in-schools/>

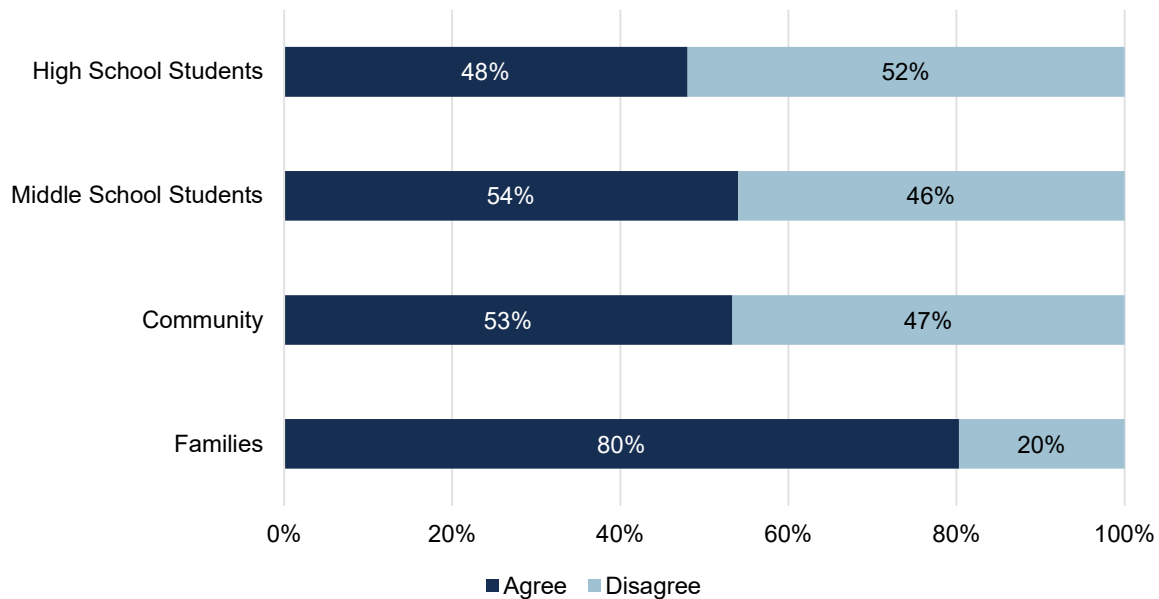
⁴³⁹ “[Jefferson County Board of Education Policy 09.4261 Telecommunication Devices](#).” Jefferson County Board of Education Policy Manual. Adopted/Amended May 13, 2025. Retrieved December 18, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>; “[Minutes of Regular Business Meeting of May 13, 2025](#).” Jefferson County Board of Education. Published May 13, 2025. Retrieved February 10, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

⁴⁴⁰ “[Minutes of Regular Business Meeting of April 29, 2025](#).” Jefferson County Board of Education. Published April 29, 2025. Retrieved February 10, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

- Implementation inconsistency across schools has led to disparities in student experiences and school environments; and
- Decreased accessibility for students who may need their phone for educational purposes, such as multilingual learners who use their phones for translation services.

Figure 133 shows how students, community members, and families perceive student engagement following the new school cell phone policy.

FIGURE 133: STUDENT, COMMUNITY, AND FAMILY AGREEMENT WITH “THE NEW CELL PHONE POLICY MAKES IT EASIER FOR STUDENTS TO PAY ATTENTION IN CLASS”



Source: Special Examination Survey.

About half of students and community members agreed that the new cell phone policy makes it easier for them or students in general to pay attention in class. Families agreed at a much higher rate, with 80% agreeing with the statement. Student open-ended survey responses reflected a negative sentiment to the cell phone policy. They felt inconvenienced with the loss of communication during non-learning times and advocated for limited use during non-instructional times.

JCPS has seen some early positive outcomes that may be associated with the cell phone ban. For example, within the first month of the 2025-26 school year (the first year that the cell phone policies were in effect), JCPS saw an uptick in library books being checked out.⁴⁴¹

Recommendation	
8.8.a	JCPS should annually assess stakeholder perceptions of the cell phone policy and its impact to help inform related policies, procedures, and communication with schools. JCPS should also review student outcomes data through a pre- and post-cell phone policy lens to understand any changes or trends.

⁴⁴¹ “Phones down, books up! JCPS Students checking out record number of books after cell phone ban.” Jefferson County Public Schools. Published February 10, 2026. <https://www.jefferson.kyschools.us/article/2387560>

ATTENDANCE AND CHRONIC ABSENTEEISM

Attendance and Chronic Absenteeism Data

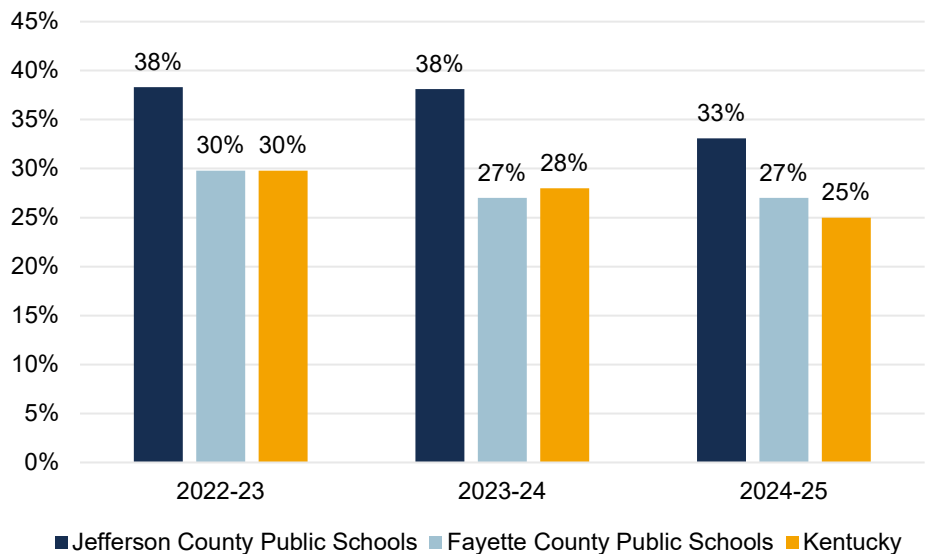
Finding	
8.9	JCPS had lower attendance and higher chronic absenteeism than the state average in the 2024-25 school year.

In the most recent school year (2024-25), JCPS had an attendance rate of 90.9% across the District. This rate was slightly higher than it had been in the previous two years (89.7%) but was still below Fayette County (92.4%), the state average (92.7%), and the pre-pandemic District average in the 2018-19 school year (93.2%).⁴⁴²

JCPS saw higher chronic absenteeism rates than both Fayette County and Kentucky for the last three years.⁴⁴³ In the 2024-25 school year, JCPS had a chronic absenteeism rate of 33%, a decrease from the previous two years. Kentucky, which had a chronic absenteeism rate of 25% in the 2024-25 school year, also saw a decrease in the most recent year. Fayette saw no change during this time.

Figure 134 and Figure 135 show chronic absenteeism in JCPS for the last three school years, both across demographic groups (Figure 135) and compared to the state (Figure 134).

FIGURE 134: CHRONIC ABSENTEEISM FOR JEFFERSON COUNTY PUBLIC SCHOOLS, FAYETTE COUNTY PUBLIC SCHOOLS, AND KENTUCKY, 2022-23 TO 2024-25 SCHOOL YEARS



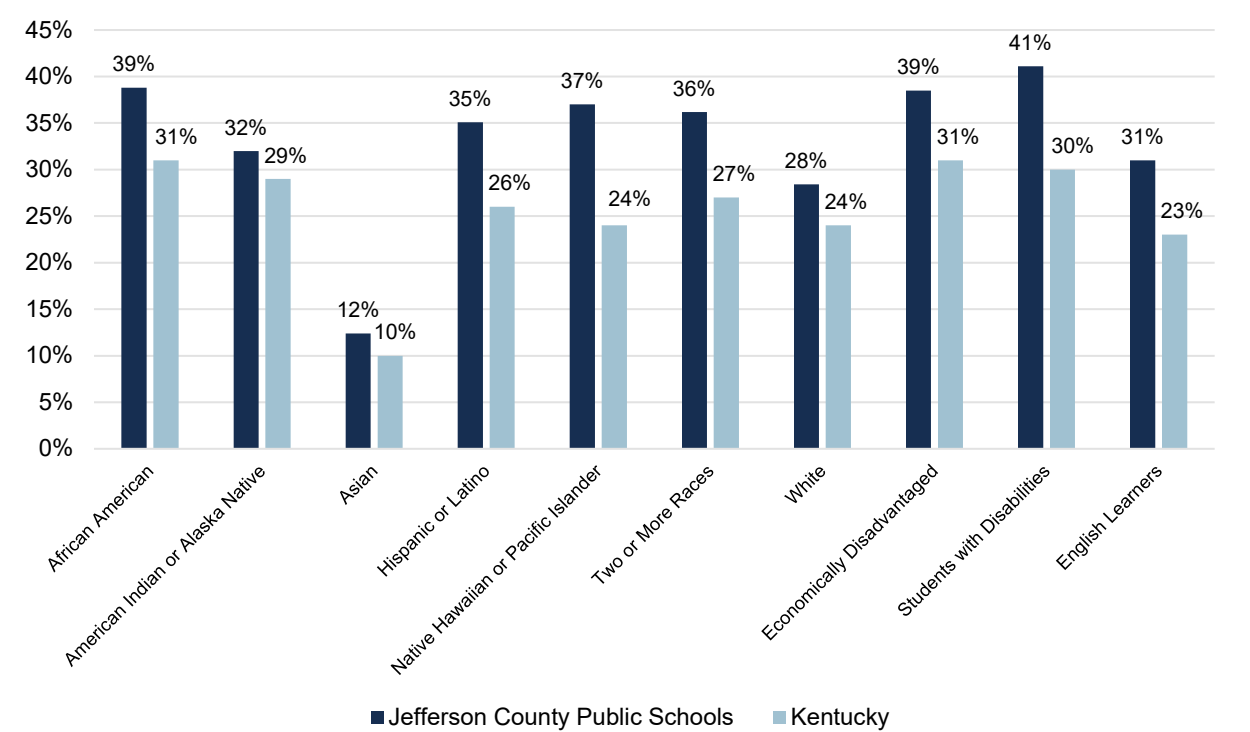
Source: Kentucky Department of Education Report Card Dashboard.

⁴⁴² “[Report Card Dashboards – Jefferson County Students Attendance](#).” Kentucky Department of Education. Retrieved December 15, 2025.
<https://reportcard.kyschools.us/kysrc?organization=20242025:275:275000&sid=067d36f5-dbfe-4fc8-3b2c-3a1288364f74&gid=d5f2ecc4-43c3-44c2-cf3a-3a1288370ce3&vizIndex=0>; “[Cascade Data Portal - Attendance Rate Trend 24-25](#).” Jefferson County Public Schools. Retrieved December 15, 2025.
<https://assessment.jefferson.kyschools.us/publicDatasets/PublicResources.aspx?id=511205>

⁴⁴³ Note: Kentucky defines a student as being chronically absent if they are present 90% or less of full-time equivalency and calculates chronic absenteeism by dividing a student’s FTE present minutes by FTE instructional minutes.

As shown in Figure 135, every subgroup in JCPS has higher rates of chronic absenteeism than their statewide peers.

FIGURE 135: CHRONIC ABSENTEEISM BY STUDENT GROUP FOR JEFFERSON COUNTY PUBLIC SCHOOLS AND KENTUCKY, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Despite lagging behind the state average, the District’s five percentage point reduction in chronic absenteeism in the 2024-25 school year is significant. JCPS highlights three core components of their strategy:

- **Communication:** JCPS sent out more than 4.5 million text messages to families on attendance in the 2024-25 school year.
- **Support:** JCPS is working to remove common barriers to attendance, such as transportation and health concerns, through phone calls and home visits.
- **Partnerships:** JCPS has expanded its truancy division program and leveraged partnerships to better understand the root causes of absenteeism and offer resources and alternatives to formal legal proceedings.⁴⁴⁴

Additional strategies and supports the District uses to combat dropout prevention and encourage re-engagement are discussed in the following sections.

Recommendation	
8.9.a	JCPS should assess which interventions have helped improve chronic absenteeism rates in recent years and leverage these practices to close gaps.

⁴⁴⁴ “[JCPS Reduces Chronic Absenteeism by 5%.](https://www.jefferson.kyschools.us/article/2513541)” Jefferson County Public Schools. Published October 28, 2025. Retrieved March 18, 2026. <https://www.jefferson.kyschools.us/article/2513541>

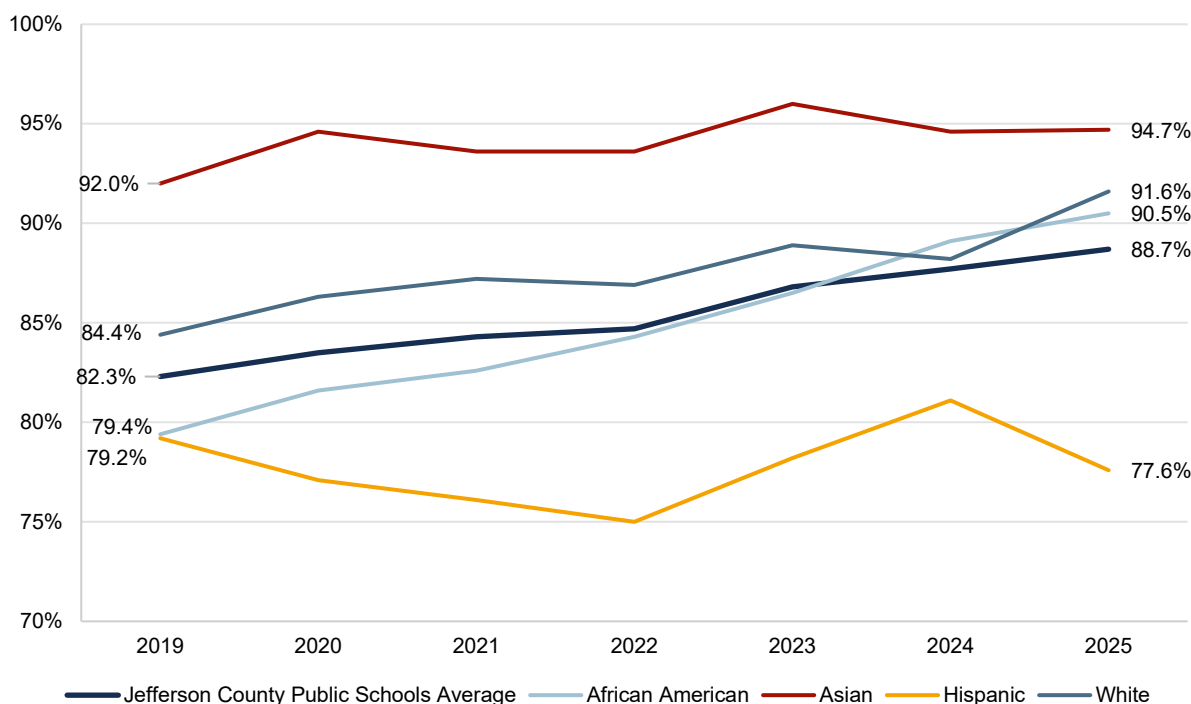
Dropout Prevention and Re-Engagement

Observation

8.10 JCPS tracks high-level dropout prevention and re-engagement effectiveness, but it is unclear the extent to which it tracks the effectiveness of individual interventions and supports.

Since 2019, JCPS has seen four-year graduation rates steadily increase (Figure 136). While this is true for most demographic groups, Hispanic students have not seen the growth that other demographic groups have.

FIGURE 136: JEFFERSON COUNTY PUBLIC SCHOOLS AVERAGE FOUR-YEAR GRADUATION RATE BY RACE/ETHNICITY, 2019-2025



Source: Kentucky Department of Education Report Card Dashboard.

JCPS has seen the four-year graduation rate increase each year from 82.3% in 2019 to 88.7% in 2025. The majority of demographic groups also saw an increase in graduation rate with African American students seeing the greatest jump from 79.4% in 2019 to 90.5% in 2025. Hispanic students, however, experienced the lowest graduation rate that fluctuated over the six-year period, declining from 79.2% to 77.6% in that same timeframe. Between 2021-22 and 2024-25, multilingual learners experienced a relatively flat graduation rate around 74% and students with disabilities saw their graduation rate increase from 73% in 2021-22 to 81% in 2024-25.

JCPS offers a range of programs, plans, and resources to help students at risk of dropping out overcome barriers and stay in school.

Figure 137 describes these interventions and supports. The REACH Corps and the Home School Coordinators were briefly discussed earlier in Community Partnerships and Support Services, as these programs are coordinated by the Student Supports team but are an aspect of the District's dropout prevention strategy.

FIGURE 137: DROPOUT PREVENTION SUPPORTS IN JEFFERSON COUNTY PUBLIC SCHOOLS

DROPOUT SUPPORT	PREVENTION	Description
REACH Corps		AmeriCorps program designed to support students who are showing early signs of disengagement. An AmeriCorps member is assigned 25 students who have between seven and 15 unexcused absences, and they re-engage both these students but also these families using Check and Connect, a mentoring program developed by the University of Minnesota. ⁴⁴⁵
Home School Coordinators		These coordinators work in 13 high schools and one middle school serving almost 1,000 disengaged or truant students who are showing signs of dropping out of school. These coordinators develop relationships with these students and work to increase parent involvement with a goal of improving attendance and increasing graduation rates. ⁴⁴⁶
FRYSC Interventions		Centers that provide support to families and students in core areas to help them overcome barriers to learning. School social workers and Family Resource Centers collaborate to build systems and provide wraparound supports (home visits, material supports, trauma-informed engagement).
PowerSchool Attendance Intervention Suite (AIS)		JCPS uses PowerSchool's Attendance Intervention Suite as a tool to improve student attendance and reduce chronic absenteeism. Tools in this suite include: • Automated Attendance Monitoring • Early Warning System • Customizable Intervention Plans • Enhanced Family Engagement • Data-Driven Decision-Making • Cross-Department Collaboration⁴⁴⁷
Alternative to Dropout Education Pathways		To ensure that all students graduate prepared, empowered, and inspired to reach their full potential, JCPS offers a variety of success pathways to ensure that all students learn in a way that best meets their needs. Educational Pathways include: • JCPS Choice Schools: Pathfinder School of Innovation, Liberty High, TAPP, & Phoenix School of Discovery • Jefferson County Adult Education • The Spot – Young Adult Opportunity Campus • Job Corps • The Excel Center • Bluegrass Challenge Academy⁴⁴⁸
Tiered Interventions to Reduce Habitual Truancy		JCPS tiers interventions based on level of chronic absenteeism.

⁴⁴⁵ “[Dropout Prevention](https://www.jefferson.kyschools.us/page/dropout-prevention).” Jefferson County Public Schools. Retrieved December 12, 2025.

<https://www.jefferson.kyschools.us/page/dropout-prevention>

⁴⁴⁶ “[Student Support Services](https://www.jefferson.kyschools.us/o/jcps/page/student-support-services-support).” Jefferson County Public Schools. Retrieved December 12, 2025.

<https://www.jefferson.kyschools.us/o/jcps/page/student-support-services-support>

⁴⁴⁷ “PowerSchool Attendance Intervention Suite (AIS) FY23-24.” Jefferson County Public Schools. [PDF]

⁴⁴⁸ “FY23-24 Pupil Personnel Alternative to Dropout Resources.” Jefferson County Public Schools. [PDF]

Scan of the Environment Tool	An initial assessment of school climate. Schools complete a scan of their schools and use the data for their Attendance Improvement Plans and Tiered interventions.
Student Surveys	Surveys are used to gauge whether at risk students feel connected to their schools. The data is used to identify students who are not thriving and guide the design of their targeted interventions.

Source: Jefferson County Public Schools website.

PowerSchool AIS includes a tracking tool that allows JCPS to track attendance and flag concerning behaviors at the student, demographic group, school and District level, but overall, it is unclear the extent to which the District is tracking effectiveness and impact of interventions and supports across demographic groups.

Recommendation	
8.10.a	JCPS should continue practices that have contributed to the steady increase in graduation rates across most demographic groups and ensure interventions and supports target Hispanic students, who have seen declines in graduation rates.

EXTRACURRICULAR ACTIVITIES AND ATHLETICS

Extracurriculars have long been associated with positive student outcomes. In 1995, NCES published data showing that participation in extracurriculars was positively associated with no unexcused absences, never skipping class, having a GPA of 3.0 or above, being in the highest quartile on composite math and reading assessments, and expecting to earn a bachelor's degree or higher.⁴⁴⁹ In 2025, a study reinforced these positive associations and found that participation in extracurricular activities drive learning, encourage friendships, and build confidence.⁴⁵⁰ These positive associations have continued to appear in research and span across both grade level and culture.⁴⁵¹

JCPS offers a wide variety of extracurricular programs that cater to different interests and talents, including athletics, arts, academic competitions, and clubs. However, when asked about barriers that prevent them from participating in extracurricular activities, about 35% of students at both the high and middle school levels reported barriers to participating in activities offered during the school day and 38% of middle school respondents and 43% of high school students reported barriers to participating in activities after school.

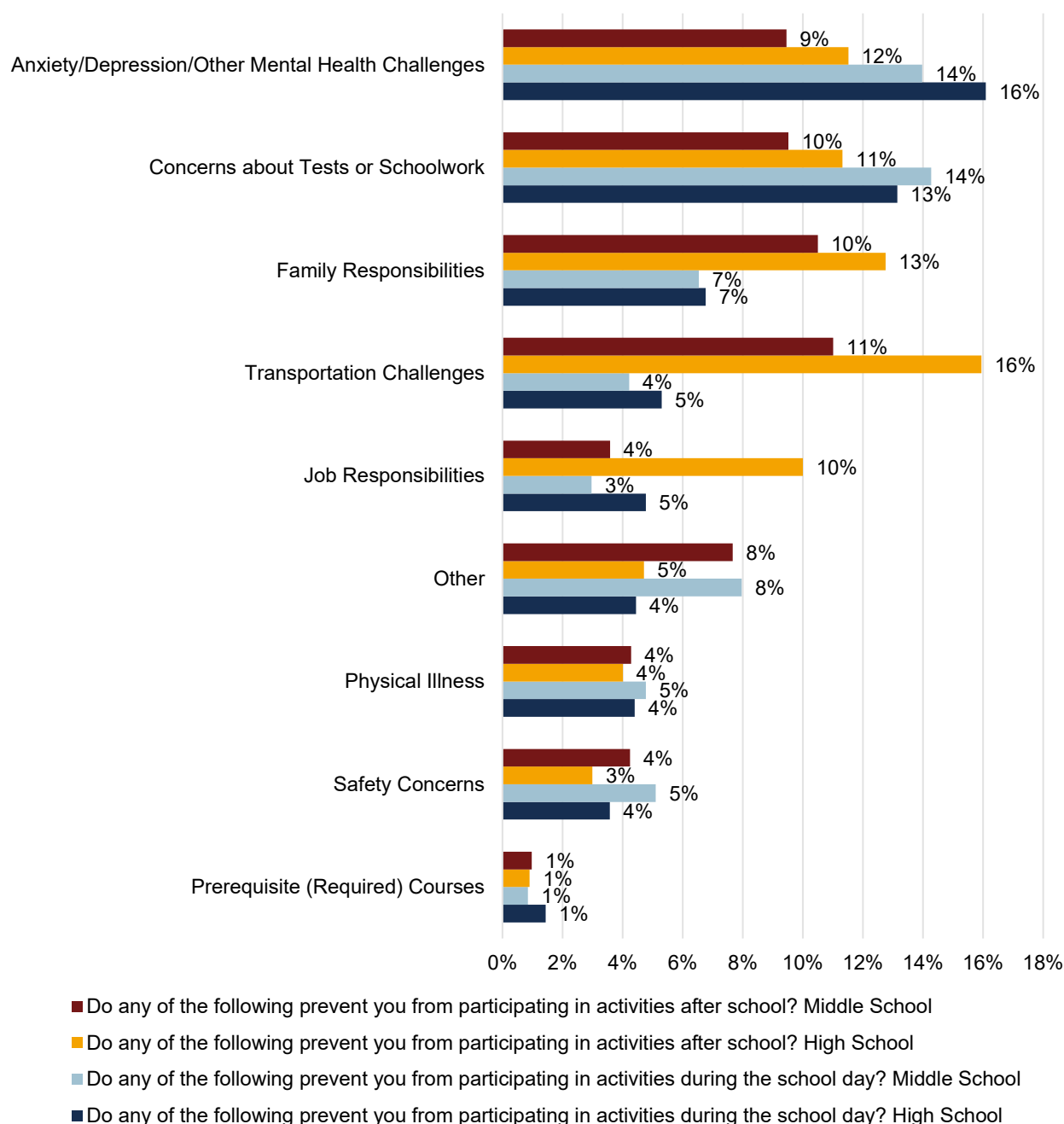
Figure 138 shows the barriers to participating in activities both during and after school for middle and high school students.

⁴⁴⁹ "Extracurricular Participation and Student Engagement." National Center for Education Statistics. June 1995. Accessed March 19, 2026. <https://nces.ed.gov/pubs95/web/95741.asp>

⁴⁵⁰ Jackson, J. "The Effect of Extracurricular Engagement on Academic Performance, Personal Growth, and Positive Behaviors in Students." Master's thesis, Bethel University. December 2025. Accessed March 19, 2026. <https://spark.bethel.edu/cgi/viewcontent.cgi?article=2226&context=etd>.

⁴⁵¹ "Extracurricular participation and student success." University of California Institutional Research and Academic Planning. August 2024. Accessed March 19, 2026. https://www.ucop.edu/institutional-research-academic-planning/_files/extra-curricular-participation-and-student-success.pdf; Verner-Filion, J., Holding, A., Gingras, I., and Koestner, R. "Extracurricular Activities – Extra Beneficial: The Role of Motivation for Extracurricular Activities on Outcomes in High-School Students." National Library of Medicine. June 18, 2025. Accessed March 19, 2026. <https://pmc.ncbi.nlm.nih.gov/articles/PMC12493012/>.

FIGURE 138: STUDENTS PERCEPTIONS OF BARRIERS THAT PREVENT THEM FROM PARTICIPATING IN ACTIVITIES DURING AND AFTER SCHOOL



Source: Special Examination Survey.

Of all barriers that prevent students from participating in activities **during the school day**, students most frequently selected anxiety, depression, or other mental health challenges (16% for high school students and 14% for middle school students) and concerns about tests or schoolwork (14% for middle school students and 13% for high school students). Of all barriers that prevent students from participating in activities **after school**, students most frequently selected transportation challenges (16% for high school students and 11% for middle school students), family responsibilities (13% for high school students and 10% for middle school students), and concerns about tests or schoolwork (11% for high school students and 10% for middle school students).

10% for middle school students), and anxiety, depression, or other mental health challenges (12% for high school students and 9% for middle school students).

Students in JCPS who are able to participate in extracurricular activities tended to appreciate them based on survey responses. When asked what they enjoyed most about school, students who responded to the survey frequently cited participation in extracurriculars, clubs, and athletics as one of the things they enjoy most about school.

In open-ended comments on the exam team's survey, students requested more variety and support for academic programs, extracurricular activities, and the arts. They also frequently cited the desire for more clubs and art programs along with additional funding for non-athletic activities.

SCHOOL SAFETY

Overview

Observation	
8.11	One-fifth of all JCPS students reported feel “unsafe” at school, according to the exam team’s survey.

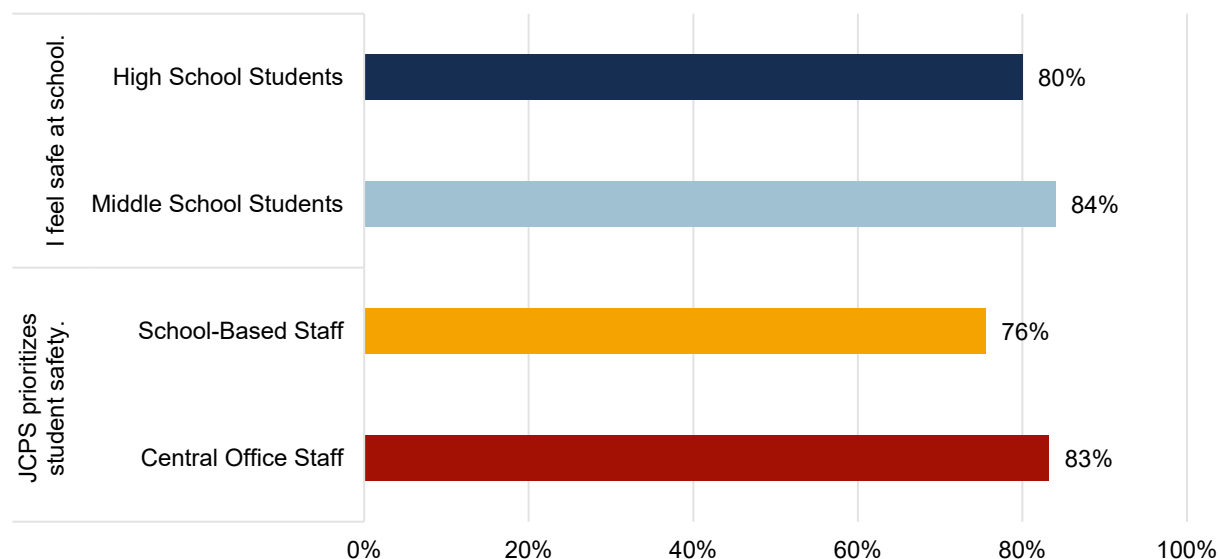
In the last few years, JCPS has made a significant investment in student safety with the launch of the Jefferson County Public Schools Police Department (JCPD) in 2022 and the weapons detection system installment in all middle and high schools between 2023 and 2024. The JCPD is discussed in more detail later in the chapter.

According to documentation provided by JCPS, the District met state statutes around school safety in both the 2022-23 and 2023-24 school years.⁴⁵² During school visits, the exam team observed physical safety measures in place, which is supported by most students reporting that they felt secure in their schools in both the exam survey and in the District’s CSS. The exam team specifically looked for two core safety practices: first, that buildings were physically secured through measures such as office check-in procedures and locked doors at all marked entrances and exits; and second, that evacuation routes were clearly identified with accurate directional signage. Both practices were consistently in place at the thirty schools the exam team visited.

In all, over 80% of students agreed that they feel safe at school in the exam survey (with high school students agreeing slightly less than middle school students), which generally aligns with the CSS results reported. Over three-quarters of staff agreed in the exam survey that JCPS prioritizes student safety.

⁴⁵² “CSIP Safety Report Emergency Plan Training FY23-24.” Jefferson County Public Schools. 2024. [Excel Spreadsheet].

FIGURE 139: STUDENT AND STAFF PERCEPTIONS OF STUDENT SAFETY IN JEFFERSON COUNTY PUBLIC SCHOOLS



Source: Special Examination Survey.

Although most school-based staff agreed that JCPs prioritizes student safety, nearly one in four disagreed, signaling a need for stronger and more consistent safety practices across schools.

In the 2025 CSS, over 85% of students reported feeling safe at school, during their commute, and outside the building before and after school, and that adults respond quickly to safety concerns. Positive response rates have trended upward from 77% in 2023. Despite these numbers increasing over the last few years, 15% of students in the CSS survey and 20% of students who responded to the audit survey reported feeling unsafe at school. When the data are reviewed by Board District, there is some variability in students' agreement with safety measures.

When looking at number of behavior incidents per student across board districts, there was no relationship in the data between student's perceptions of safety and the behavior incident rate, as the behavior incident rate was not higher when perceptions of school safety were lower and vice versa. Behavior incidents per student range from 0.13 in Board District 3 to 0.26 in Board District 4.

FIGURE 140: 2025 CSS PERSONAL SAFETY RESULTS

BOARD DISTRICT	I feel safe on my way to and from school.	I feel safe outside the building before and after school.	I feel safe at school.
District 1	85%	86%	83%
District 2	90%	91%	85%
District 3	89%	92%	85%
District 4	87%	89%	82%
District 5	87%	89%	85%
District 6	89%	91%	87%
District 7	90%	93%	89%

Source: Jefferson County Public Schools 2025 Comprehensive School Survey.

For example, schools in Districts 1 and 4 see the lowest agreement regarding perceived school safety while District 7 schools reported the highest agreement with feelings of school safety.⁴⁵³ These perceptions of safety were not directly aligned to discipline incidents per student. However, District 4 had the highest number of discipline events per student and District 7 had the second lowest number of discipline events per student.

Recommendation	
8.11.a	JCPS should explore in greater detail why one-fifth of its students feel unsafe and work to remedy that issue, since there does not appear to be a correlation between school behavior incidents and feeling unsafe.

Arrival and Dismissal Procedures

As seen in Figure 141, arrival and dismissal processes observed during the school visits were generally very safe and effective, with seven of the 12 core practices (listed below) observed during all visits.

- The other five core practices were observed at over 80% of schools visited. Five schools did not have crossing guards to assist with street crossings. These schools were in five different Board Districts and represented high schools, elementary schools, and special schools.
- All schools had multiple staff outside assisting with the arrival or dismissal, and most of these staff demonstrated effective communication.
- Of the 15 schools observed, 11 had buses to transport students, while the remaining four schools did not have access to bus transportation services. The 11 schools demonstrated the core practices around bus procedures and safety.
- All five high schools visited had student parking areas, all of which were appropriately monitored.

⁴⁵³ “[Research & Systems Improvement – Comprehensive School Survey](https://www.jefferson.kyschools.us/page/research-and-systems-improvement),” Jefferson County Public Schools. Retrieved December 17, 2025. <https://www.jefferson.kyschools.us/page/research-and-systems-improvement>

FIGURE 141: EXAM TEAM SCHOOL VISITS - ARRIVAL AND DISMISSAL PROCEDURES

Evidence Based Strategy	Core Practice	Percent of schools in sample demonstrating this practice
Arrival / Dismissal procedures are clear and safe for all staff, students, and families on-site.	Areas / zones clearly marked for students to enter / exit building safely.	100%
	Buses are clearly marked with assigned routes (e.g., window signage).	100%
	Staff communication is effective and emergency comms are available (e.g., walkie talkies, visuals, etc.).	100%
	Student parking areas are appropriately monitored (where applicable).	100%
	Students congregate in areas at a safe distance from the street with active traffic (if applicable).	100%
	Students enter / exit buses safely.	100%
	Students observed on buses (while idling) appear to act safely.	100%
	Multiple adult staff visible outside the school building to greet and assist students during arrival / dismissal procedures.	93%
	Parent drop-off/pick-up process is clear and safe (where applicable).	93%
	Student walkways / crosswalks are clearly marked for safe navigation to/from the building and around idling vehicles.	93%
	Students enter / exit cars safely.	93%
	Crossing guards / staff assist with crossing streets (where applicable).	82%

Source: Exam team school visits.

Arrival and dismissal procedures were generally well-run, especially at schools that recently updated traffic flows. A few schools mentioned upcoming renovations to improve flow for car riders. Finally, school leaders noted that bus transportation had improved and become more reliable at schools where this service remained an offering.

Weapons Detection

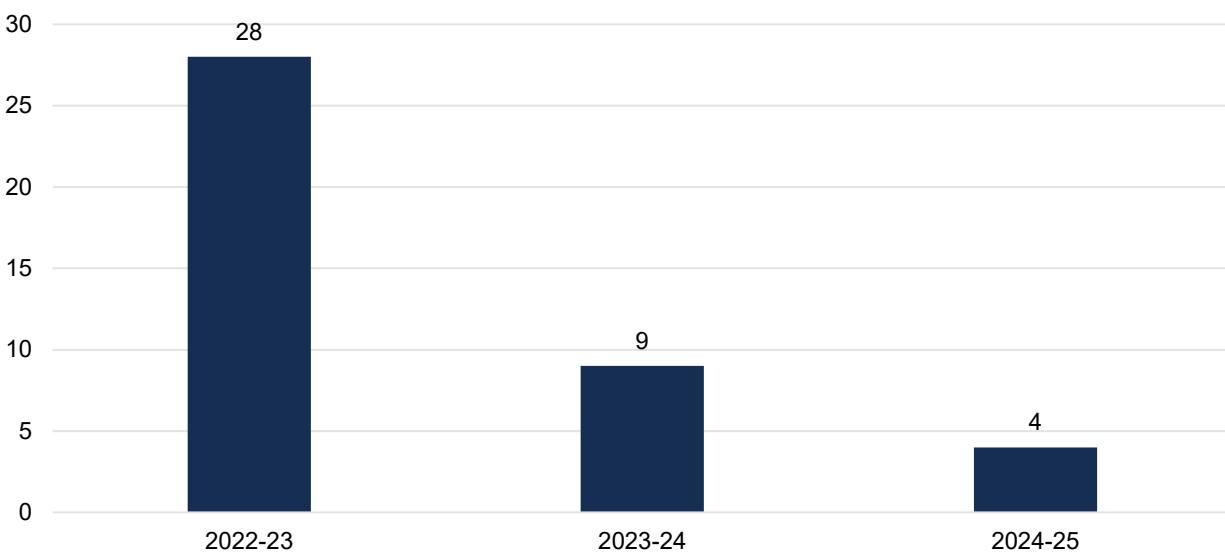
Finding	
8.12	JCPS has not allocated adequate funding or school-level staffing resources to ensure the effective implementation and ongoing maintenance of the weapons detection systems.

On May 9, 2023, the Board voted to purchase an \$11.7M weapons detection system for JCPS high schools and middle schools to make schools safer for students.⁴⁵⁴ JCPS rolled out the Evolv Weapons Detection between Fall 2023 and Fall 2024, installing them first in high schools then in middle schools.⁴⁵⁵ Overall, the weapons detection system is viewed as a positive addition to the school environment with families, school-based staff, and District leadership citing that they perceive the school environment to be safer as a result of these systems. In terms of less positive insights shared in focus groups and surveys:

- Students expressed concerns over the time it takes to enter school due to the screenings.
- Families expressed a desire for increased transparency about the system's effectiveness and results of implementation.
- Staff expressed challenges with staffing and operation requirements for the system.

Figure 142 shows the number of weapons recovered on campus has gone down from 28 in the 2022-23 school year (the year prior to the weapons detection systems installation) to four in the 2024-25 school year. This decrease suggests the system acts as a deterrent to bringing weapons on school grounds.⁴⁵⁶

FIGURE 142: WEAPONS RECOVERED ON SCHOOL CAMPUSES, 2022-23 TO 2024-25 SCHOOL YEARS



Source: Jefferson County Public Schools Police Department Enforcement Reporting Reports.

In focus groups, many school leaders cited funding and staffing as a challenge. While the District allocated \$11 million total in the 2023-24 and 2024-25 budgets for weapons detection system installation, equipment, and services, school leaders cited current and future funding concerns. School leaders referenced the significant staffing required to run the weapons detection system. Principals in focus groups noted these systems require multiple staff to operate, especially since students have to unload their Chromebooks to avoid alerting the system. When the system is triggered, an administrator must conduct the secondary search. Between monitoring, false positives, and secondary screenings, principals cited that the detection systems pull resources away from other school duties to ensure the systems are staffed. They also discussed concerns around paying for any future updates or fixes to the system. In its 2023-24 and 2024-

⁴⁵⁴ "Minutes of Special Meeting of May 09, 2023." Jefferson County Board of Education. Published May 9, 2023. Retrieved February 12, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>.

⁴⁵⁵ Roldan, Roberto. "JCPS approves \$11.7M for AI weapons detection in schools." Louisville Public Media. Published July 26, 2023. Retrieved February 12, 2026. <https://www.lpm.org/news/2023-07-26/jcps-approves-11-7m-for-ai-weapons-detection-in-schools>; "JCPS Weapons Detection." Jefferson County Board of Education. Retrieved November, 26, 2025. <https://www.jefferson.kyschools.us/page/weapon-detection>.

⁴⁵⁶ "Enforcement Reporting July 1st, 2023 through June 30th 2024." Jefferson County Public Schools Police Department. 2024. [PDF].; "Enforcement Reporting August 1st, 2024 through May 31st, 2025." Jefferson County Public Schools Police Department. 2025. [PDF].

25 budgets, JCPS allocated a total of \$11M (\$7M in the first year and \$4M in the second year) to the weapons detection systems as one-time investments for system implementation. In the 2025-26 budget and the proposed budget for the 2026-27 school year, JCPS does not have money explicitly allocated to these systems.

Principals also expressed frustration in focus groups. For arrival procedures, they referenced both a strain on personnel and budget to staff these systems. Additionally, they mentioned that although their schools have mobile detection equipment, the District prohibits them from using it for after-school events. Instead, principals or trained administrators must manually screen spectators with a wand. They report that this process consumes much of the event time and prevents them from engaging with students and families.

Recommendations	
8.12.a	JCPS should allocate additional resources to schools to properly staff weapons detection systems and establish a long-term plan for sustainability of both the equipment and implementation practices.
8.12.b	JCPS should conduct an analysis on the use of mobile detection equipment at after school events to assess cost, wear, and tear on machines, and whether all schools have access to a mobile unit.

Violence Prevention and Collaboration with Law Enforcement

JCPS describes their violence prevention strategy as multi-layered and collaborative, combining law enforcement involvement with proactive, trauma-informed supports led by school staff and specialized teams. School Resource Officers (SROs) focus on consistent law enforcement and only intervene in criminal or physically escalating situations, while school personnel prioritize restorative behavioral management. Collaboration between the JCPD, Louisville Metropolitan Police Department (LMPD), and the Office of Culture and Climate aims to ensure comprehensive, community-aware responses to violence.⁴⁵⁷

Specialized teams within JCPS, such as the Crisis Response Team and the Violence Prevention Team, address both immediate crises and long-term prevention. The JCPS Crisis Response Team (CRT) is a unit responsible for providing swift, coordinated support during school crises. CRT consists of 23 team leaders and a network of 125 trained responders — including counselors, mental health practitioners, psychologists, and social workers — prepared to address a wide range of traumatic events. Their operations are guided by systematic protocols and communication channels, with a goal of initiating support within an hour and fifteen minutes of a crisis notification. CRT works alongside regional teams, law enforcement, and specialized services, ensuring comprehensive and timely interventions for students, staff, and families affected by incidents.

JCPS's crisis response process is grounded in nationally recognized best practices, drawing from guidance by the National Association of School Psychologists (NASP) and the PREPaRE curriculum, which was developed by NASP to provide evidence-based resources and consultation related to school crisis prevention and response.⁴⁵⁸ CRT's approach includes direct support, coordination with school leaders, and communication with families, with an emphasis on connecting those impacted to long-term services as needed. The District's formal communication structures and approval channels operate with the goal of providing clarity, consistency, and unity in response efforts, while the Violence Prevention Team — which includes the director of violence prevention, the court liaison director, school psychologists, and re-

⁴⁵⁷ "JCPS Champions Student Support Through Prevention and Response." Jefferson County Public Schools. Published August 25, 2025. Retrieved December 12, 2025. <https://www.jefferson.kyschools.us/article/2375303>

⁴⁵⁸ "PREPaRE Training Curriculum." National Association of School Psychologists. Retrieved March 20, 2026. <https://www.nasponline.org/professional-development/prepare-training-curriculum>.

engagement associates — aims to provide ongoing, proactive support to mitigate future incidents and promote student well-being.⁴⁵⁹

As described in the District's Trauma-Informed Care Plan, JCPS staff receive seven trauma-informed care training modules to identify and support at-risk students early, connecting them with mental health resources. As of Fall 2025, the District had trained 98.8% of its 12,494 school-based staff on Trauma Informed Care.⁴⁶⁰ In addition, targeted initiatives, like the Project Prevent Grant, are designed to mitigate the effects of violence on students and families, with progress monitored through data dashboards to inform timely interventions and improve overall school climate.

STUDENT BEHAVIOR AND DISCIPLINE

Overview of Policies

JCPS articulates a Districtwide commitment to supporting students holistically through the integration of:

- **Positive Behavior Interventions and Supports (PBIS):** A proactive and positive approach to encouraging desired student behavior. JCPS schools that implement PBIS are expected to establish schoolwide expectations, procedures and routines, and an acknowledgement/reward system.⁴⁶¹
- **Restorative Practices (RP):** A framework for managing conflict and tension by repairing relationships. RFP balances high levels of accountability and expectations with support and encouragement.⁴⁶²
- **Multi-Tiered System of Supports (MTSS):** A framework for addressing students' academic, social, emotional, and behavioral development.⁴⁶³ More about MTSS is discussed in the **Curriculum & Instruction** chapter.
- **Social-Emotional Learning (SEL):** Tools to help students understand their feelings, make good choices, and build relationships with others.⁴⁶⁴

These initiatives are designed to cultivate a positive school community, enhance engagement, and foster relationships among students and staff.⁴⁶⁵

The District's Behavior Systems Department is primarily responsible for supporting schools with PBIS and RP. This Department provides training in evidence-based approaches and helping schools build positive environments and strong relationships. In addition, JCPS distributes a Student Support and Behavior Handbook annually, which all students, parents, and guardians are required to read and sign within one month of distribution. This handbook details behavior interventions and consequences, organized into four levels of severity and differentiated by grade bands (PreK-3, 4-5, and 6-12), along with specific behavior codes for clarity.⁴⁶⁶

⁴⁵⁹ "JCPS Champions Student Support Through Prevention and Response." Jefferson County Public Schools. Published August 25, 2025. Retrieved December 12, 2025. <https://www.jefferson.kyschools.us/article/2375303>

⁴⁶⁰ "Trauma Informed Care Response 7.31." Jefferson County Public Schools. 2025. [Microsoft Word].

⁴⁶¹ "Positive Behavior Interventions and Supports – PBIS." Jefferson County School District. Retrieved March 30, 2026. <https://sites.google.com/jefferson.kyschools.us/jcpsmtssbehavior/pbis>

⁴⁶² "JCPS Behavior Systems: Restorative Practices." Jefferson County School District. Retrieved March 30, 2026. <https://sites.google.com/jefferson.kyschools.us/jcpsmtssbehavior/restorative-practices>

⁴⁶³ "What is MTSS?" Jefferson County School District. Retrieved March 30, 2026.

<https://sites.google.com/jefferson.kyschools.us/jcpsmtss/home>

⁴⁶⁴ Ibid.

⁴⁶⁵ "Culture & Climate." Jefferson County Public Schools. Retrieved December 18, 2025.

<https://www.jefferson.kyschools.us/page/culture-climate>

⁴⁶⁶ "2025-26 Student Support and Behavior Intervention Handbook." Jefferson County Public Schools. Retrieved December 18, 2025. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/7c79ccca-2d16-4e95-a7c4-323f3b620355/Student_Support_and_Behavior_Intervention_Hand.pdf?disposition=inline

Despite these structured efforts, stakeholders voiced concerns in focus groups about the effectiveness of discipline strategies. There is the perception among stakeholders that inconsistent accountability for negative student behavior leads to disruptions in the learning environment. CSS data revealed that less than 65% of students across all grade levels agreed that they understood expectations for their behavior and less than 75% agreed school rules are fair for all students and that the consequences for breaking school rules are the same for all students.⁴⁶⁷

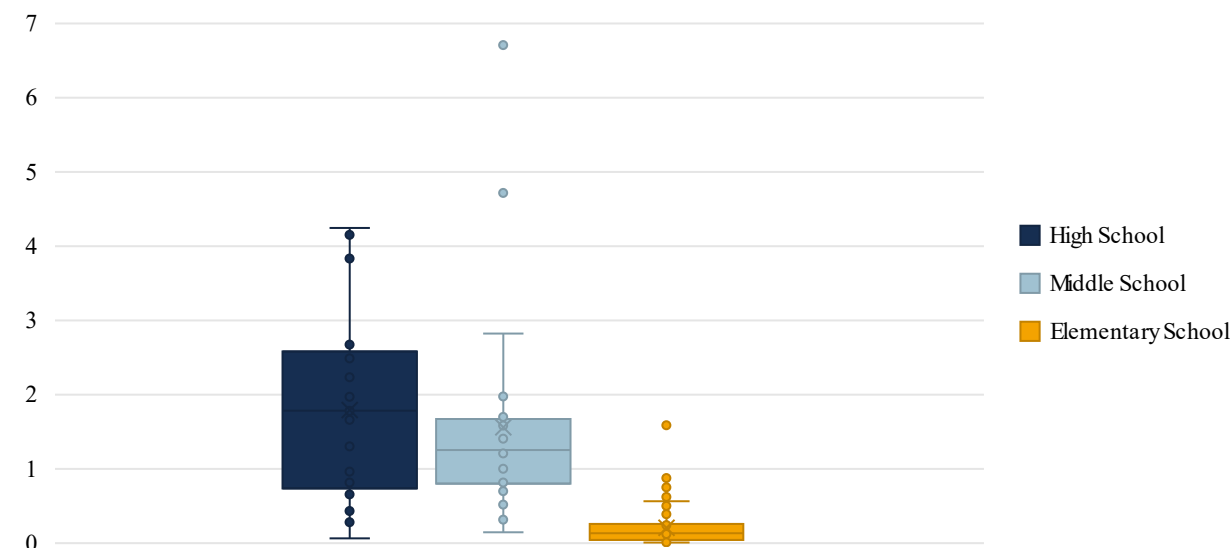
In the exam survey and focus groups, families advocated for more supportive school environments and expressed concern about their schools lacking effective support and resources to deal with bullying and behavior issues. In the survey open responses, teachers and school staff cited positive relationships in the classroom as crucial for improving student behavior and performance. They also reported feeling overwhelmed by additional responsibilities associated with these frameworks, often without sufficient support. They also requested additional training for effective SEL programs.

Student Discipline

Finding	
8.13	Behavior and discipline events vary across both schools and student subgroups, with African American students and Students with Disabilities disproportionately experiencing behavior events.

JCPS discipline data shows significant variation depending on the school and demographic group. The behavior events reported in Figure 143 and Figure 144 include incidents such as alcohol use, assault, drug offenses, harassment, tobacco violations, weapons possession, other forms of assault or violence, and additional events that result in state-level resolutions (formal disciplinary action taken against a student that is required to be reported to KDE). Figure 143 displays the average number of behavior events per student for each school. For high schools, the District average is 1.78, meaning that, on average, each high school student experienced 1.78 behavior events during the 2023-24 school year.

FIGURE 143: JEFFERSON COUNTY PUBLIC SCHOOLS AVERAGE BEHAVIOR EVENTS PER STUDENT ACROSS SCHOOLS, 2023-24 SCHOOL YEAR



Source: 2024 Jefferson County Public Schools School Safety Data.

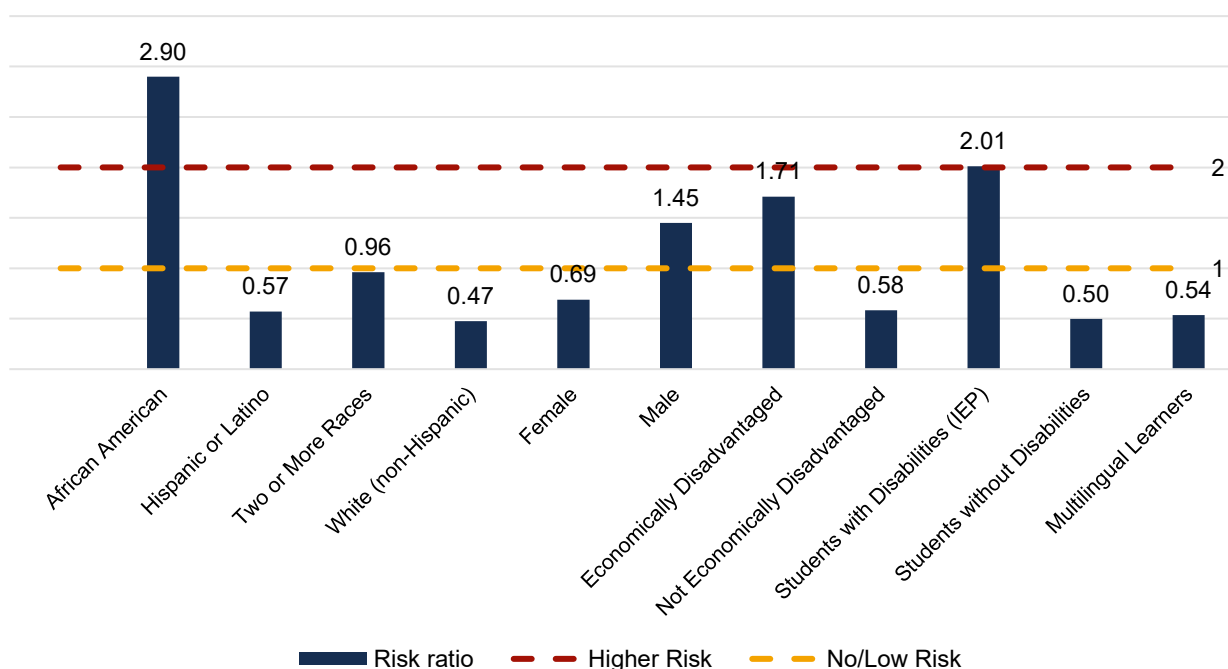
⁴⁶⁷ "JCPS Comprehensive School Survey." Jefferson County Public Schools. Published 2025. Retrieved December 18, 2025. <https://sites.google.com/jefferson.kyschools.us/jcps-css/home>

There are differences in average behavior events by school level, as shown in Figure 143.

- At the high school level, DuPont Manual High School reports the lowest rate, with each student averaging only 0.06 behavior events during the year.
- In contrast, Marion C. Moore School has the highest average, with each student experiencing 4.24 behavior events.
- For middle schools, the numbers are generally lower — excluding two outliers — with Echo Trail having the fewest behavior events per student and Thomas Jefferson Middle School having the most.
- Elementary schools also show variation, but the range is smaller, from 0.01 events per student at Smyrna Elementary School to 1.59 at Coleridge-Taylor Montessori Elementary.⁴⁶⁸

Figure 144 displays behavior event data from the 2023-24 school year by student group, showing each group's likelihood of having a behavior event.

FIGURE 144: BEHAVIOR EVENT RISK RATIOS BY STUDENT GROUP, 2023-24 SCHOOL YEAR



Source: 2024 Jefferson County Public Schools School Safety Data.

Note: Risk ratios are calculated by dividing the percent of behavior events received within a specific subgroup by the percent of all students, excluding that specific subgroup, with behavior events.

According to the risk ratios, which determine how much more likely a certain group is to experience a behavior event than another student, African American students at JCPS are 2.9 times more likely to have a reported behavior event compared to other students in the District. Students with disabilities have the next highest risk, facing reported behavior events at 2.01 times the rate of their peers. In contrast, white students and those without disabilities have the lowest risk ratios, indicating they are less likely to be involved in behavior events.⁴⁶⁹ These trends are not unique to JCPS, in 2020-21, African American students

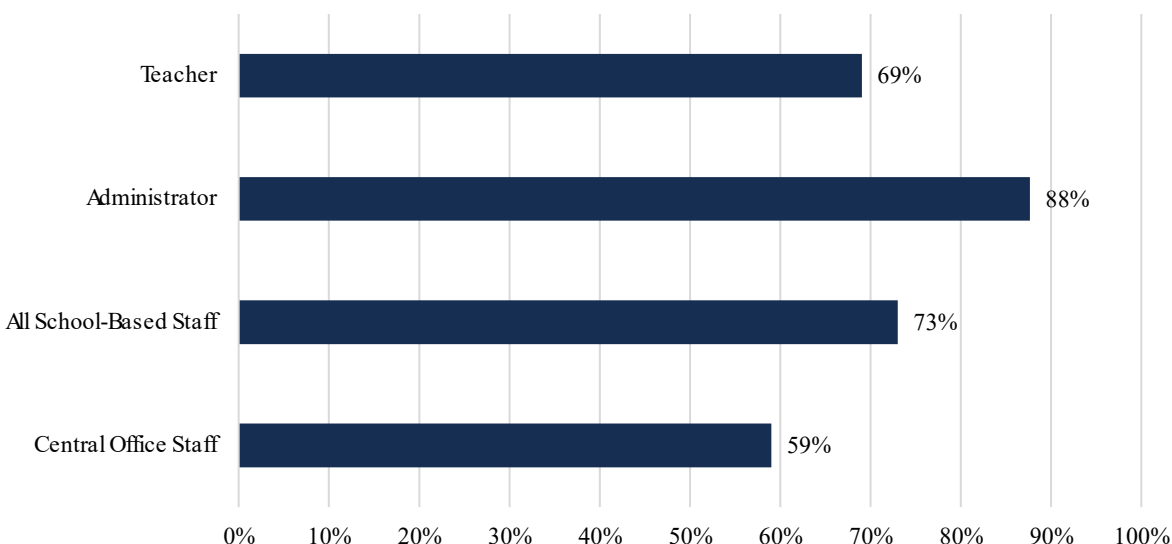
⁴⁶⁸ "School Safety Data 2024 – KYRC24_SAFE_Behavior_Events." Jefferson County Public Schools. 2024. [Excel Spreadsheet].

⁴⁶⁹ Ibid.

made up 15% of the U.S. K-12 population but accounted for 22% of in-school suspensions, 27% of out-of-school suspensions, and 26% of expulsions.⁴⁷⁰

Figure 145 shows survey data collected from staff across the District on whether they agreed that student behavior incidents are managed appropriately by leadership.

FIGURE 145: STAFF AGREEMENTS WITH "STUDENT BEHAVIOR INCIDENTS ARE MANAGED APPROPRIATELY BY LEADERSHIP"



Source: Special Examination Survey.

There is a noticeable difference in perceptions between school-based staff and Central Office staff regarding how leadership manages student behavior incidents: 73% of all school-based staff and 88% of administrators agree that incidents are managed appropriately, compared to only 59% of Central Office staff.

Recommendation	
8.13.a	JCPS should establish a quarterly discipline review process that analyzes behavior event rates and resolutions by school, grade level, incident type, and student subgroup and investigate drivers of disproportionality. JCPS should publicly report progress toward reducing risk ratio gaps over time.

JCPS POLICE DEPARTMENT

In 2022, the Board voted to establish the JCPS Police Department (JCPD), the District's own internal police force.⁴⁷¹ This shift brought law enforcement and investigative responsibilities under District control, including a District Operations Center (DOC), which functions as a dispatch center. Their primary mission is to protect schools, provide visible deterrence, and respond consistently to criminal activity. Of the six

⁴⁷⁰ "Student Discipline and School Climate in U.S. Public Schools." U.S. Department of Education, Office for Civil Rights. November 2023. Retrieved March 19, 2026. <https://www.ed.gov/sites/ed/files/about/offices/list/ocr/docs/crdc-discipline-school-climate-report.pdf>

⁴⁷¹ Louisville Public Media. "JCPS police force is bigger than promised and millions over budget." Louisville Public Media. Published December 2, 2024. Retrieved March 19, 2026. <https://www.lpm.org/investigate/2024-12-02/jcps-police-force-is-bigger-than-promised-and-millions-over-budget>

peer comparison districts used in this exam, four have their own police departments. The two that do not have their own police department do have departments dedicated to school safety and security.

From focus groups, interviews, and survey responses, many stakeholders in the District, including school-based staff and leaders, generally viewed the establishment of a Police Force as improving safety and security across the District. While students did not specifically mention JCPD in their free responses, staff, family, and community stakeholders suggested students may have mixed feelings about JCPD in schools due to the broader societal and cultural perceptions of police.

The Chief of Police, who leads JCPD, is part of the Superintendent's cabinet. Within JCPD, there are two Majors (Supervisors of Internal Security), one is in charge of the uniform patrol officers (SROs) and the property room. The other is in charge of administrative procedures, which includes the DOC, investigations, training, District Security Monitors, equipment, and maintaining the standard operating procedures. The current organizational chart effective through June 30, 2026, shows that JCPD consists of 95 positions, which includes 59 SROs staffed geographically across the District. Effective July 1, 2026, when the revised organizational chart is implemented, the Police Chief will still report to the Superintendent and JCPD will consist of 147 positions. This increase of 52 positions is primarily attributable to the addition of 55 Risk Assessment Consultants, a role established following the District's proposal to eliminate all 74 safety administrator positions as part of restructuring the Schools Division.⁴⁷²

Finding	
8.14	JCPS Police Department (JCPD) may have disproportionately charged (cited or arrested) Black or African American students in the 2024-25 school year.

From July 2024 to April 2025, when JCPD responded to incidents, Figure 146 shows that they either took no action or resolved the situation on site in about half of the cases.

FIGURE 146: JEFFERSON COUNTY PUBLIC SCHOOLS POLICE DEPARTMENT ACTIONS TAKEN WHEN CALLED, JULY 2024 - APRIL 2025

ACTIONS TAKEN	Percent of Time
No Action / Resolved on Site	47.5%
Report Taken	30.9%
Citation Taken	7.1%
Under Investigation	4.9%
Arrest Made	4.5%
Unfounded	4.2%
Warrant / Outside Agency	0.9%

Source: Jefferson County Public Schools External Data Review Team Presentation, April 15, 2025.

JCPD made 120 citations or arrests from July 2024 to April 2025. Black and white students made up all these charges with African American students accounting for 89% of those charges despite representing only 35% of the JCPS student population. For context, the three largest racial groups that make up the

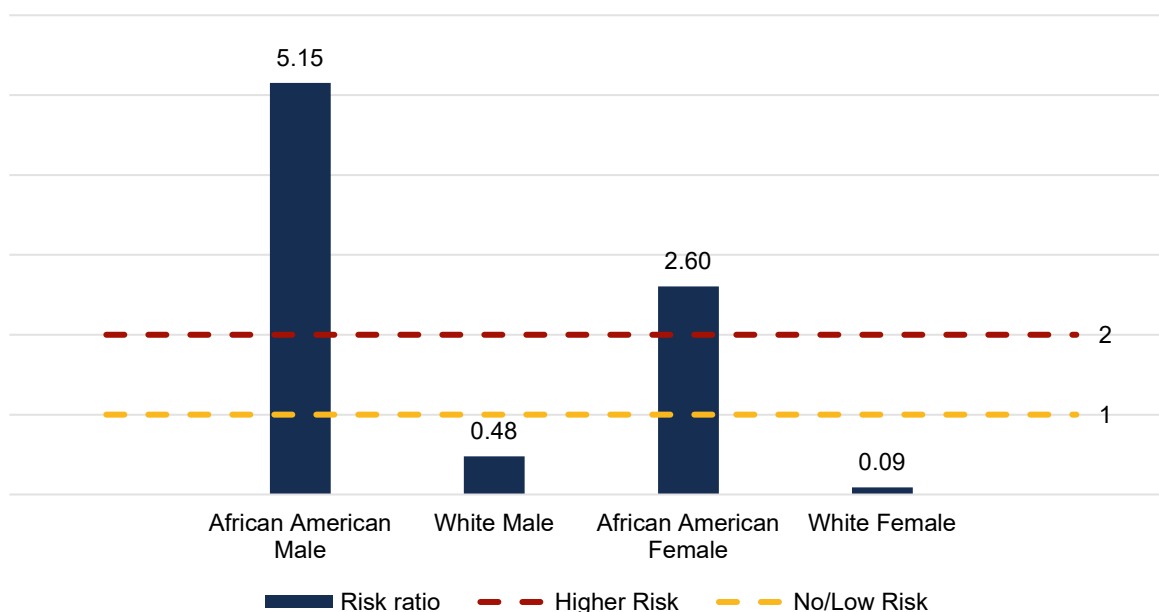
⁴⁷² Schani, Adi. "JCPS organizational charts outline which central office jobs are being cut." WDRB. Published February 9, 2026. Retrieved February 11, 2026. https://www.wdrb.com/news/education/jcps-organizational-charts-outline-which-central-office-jobs-are-being-cut/article_5fbd39ed-2355-4e0a-b97d-ba669ca84169.html; Garcia-Franceschini, Fernando. "It will make students unsafe: Safety administrators cut as part of JCPS budget decisions." WAVE. Published February 16, 2026. Retrieved March 20, 2026. <https://www.wave3.com/2026/02/16/it-will-make-students-unsafe-safety-administrators-cut-part-jcps-budget-decisions/>.

JCPS student population are: African American students (35%), white students (33%), and Hispanic students (19%).

Figure 147 shows the risk ratios, or how much more likely each subgroup is to face charges. African American male students were over five times as likely to face JCPD charges than other JCPS students while white male students were less than half as likely. African American female students were also at a high risk (2.6 times) of having charges while white female students had a very low risk.⁴⁷³

The exam team did not, however, have access to JCPD charges data disaggregated by behavior type, charge type, and race to assess disproportionality by race at a more granular level. As a result, the cited data is not, alone, sufficient to determine whether an actual disparity exists. Rather, the data is provided shows a potential disproportionality issue for JCPS to independently explore and investigate in the future.

FIGURE 147: JEFFERSON COUNTY PUBLIC SCHOOLS POLICE DEPARTMENT CHARGES RISK RATIOS, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools External Data Review Team.

Note: Risk ratios are calculated by dividing the percent of charges received within a specific subgroup by the percent of all students, excluding that specific subgroup, who received a JCPD charge.

JCPD meets regularly with the Accountability, Research, and Systems Improvement (ARSI) Division to review arrest and citation data and has been transparent about racial disparities, particularly the significantly higher arrest rates among African American female students. The exam team did not, however, learn about the exact analyses JCPS uses to assess these potential disparities. To address these potential inequities, JCPD reports to have committed to implementing a comprehensive diversion program designed to reduce formal citations and arrests. The goal of this initiative is to provide alternatives to juvenile court and minimize long-term negative impacts on students.

Currently, JCPD works closely with the District's Culture and Climate team — which includes violence prevention, bullying prevention, behavior systems, MTSS, SEL, and student relations — to avoid criminalizing student behavior and to identify appropriate interventions. During interviews, the exam team learned that JCPD staffing levels are currently stable, which has allowed JCPD to refine its recruitment strategy to hire younger officers and better reflect the diversity of the student population. JCPD reports that

⁴⁷³ "JCPS External Data Review Team." Jefferson County Public Schools. April 15, 2025. [PDF presentation].

approximately 44% of its officers are from minority backgrounds. By comparison, in 2024, 81% of the LMPD officers were white, 13% were African American, and 6% were other races.⁴⁷⁴

Recommendation	
8.14.a	JCPS should continue to hold monthly meetings to analyze the underlying causes and trends related to possible disproportionate citations within the District. Specifically, JCPD should review charges by discipline event, race, and punishment. These sessions should involve all key District leaders, including, at a minimum, representatives from JCPD, ARSI, Culture and Climate Department, and the Schools Division. Along with District-level meetings, JCPD should also organize meetings at the school level to identify root causes and patterns of citation disproportionality at individual schools.

⁴⁷⁴ Robinson, A. "[Louisville police department focuses on diversity in recruitment efforts](https://www.wdrb.com/news/louisville-police-department-focuses-on-diversity-in-recruitment-efforts/article_e8afafdc-e1d0-414e-8442-ae4b9b2642f8.html)." WDRB. Published June 26, 2025. Retrieved February 17, 2026. https://www.wdrb.com/news/louisville-police-department-focuses-on-diversity-in-recruitment-efforts/article_e8afafdc-e1d0-414e-8442-ae4b9b2642f8.html

CHAPTER 9: CURRICULUM & INSTRUCTION

OVERVIEW

This chapter outlines practices, programs, and initiatives related to curriculum and instruction within JCPS. The Academics and Schools Divisions are the primary divisions responsible for supporting schools to effectively deliver classroom curriculum and instruction. These divisions provide resources, supervision, and professional development, ensuring that educators are equipped with the tools and support needed to foster high-quality teaching and meaningful student learning experiences. Their work is supported by other Central Office divisions including Diversity, Equity, and Poverty (DEP); Exceptional Children Education (ECE); Assessment, Research, and Systems Improvement (ARSI); Human Resources (HR); and the Office of the Chief of Staff (Culture & Climate and Student Support Services).

As part of the District's Central Office reorganization set to go into effect on July 1, 2026, the Schools and Academics Divisions will merge into one division led by a Chief Academic Officer. This chapter primarily focuses on the work of the Academics and Schools Divisions. It should also be noted that the exam team centered its review on core academic subjects, including Reading, Mathematics, Science, and Social Studies.

VISION & STRATEGY

Observation	
9.1	Following the 2025 superintendent transition, the District's messaging on academic goals changed; however, there is no evidence that the updated message was systematically communicated to the Board, principals, or the broader community.

In exam interviews in Spring and Fall 2025, Central Office staff, especially Academics and Schools Division staff, shared that the Goals and Guardrails set the strategy for their work, particularly related to student outcomes. The Goals and Guardrails, adopted in 2023-24 by the Board, articulate the District's five-year academic priorities. All five of the goals relate to academics:

- **Elementary School Academic Readiness:** percentage of fifth graders who score "ready" on the JCPS academic readiness measures
- **Middle School Academic Readiness:** percentage of eighth graders who score "ready" on the JCPS academic readiness measures
- **High School Academic Readiness:** percentage of 12th graders who score "ready" on the JCPS academic readiness measures
- **Third Grade Literacy:** percentage of third graders who meet or exceed their expected growth and/or achievement benchmarks (50th percentile) on the spring Map assessment in Reading
- **Eighth Grade Numeracy:** percentage of eighth graders who meet or exceed their expected growth and/or achievement benchmarks (50th percentile) on the spring Map assessment in Math⁴⁷⁵

Principal supervisors described how they frequently reviewed related metrics to assess the progress of schools in their portfolios. Schools Division staff noted that they use the Goals and Guardrails to set individual professional development growth goals for the year, in addition to goals for the schools in their portfolios. Notably, as of November 18, 2025, the District had presented an update to the Board for all interim Goals and Guardrails based on data from the 2024-25 school year.⁴⁷⁶ However, as of January 2026, neither the District or the Board has published or confirmed all targets related to the Goals and Guardrails

⁴⁷⁵ "Goals & Guardrails." Jefferson County Public Schools. Retrieved December 3, 2025.

<https://www.jefferson.kyschools.us/o/jcps/page/goals-and-guardrails>

⁴⁷⁶ "JCBE Meeting – November 18, 2025." Jefferson County Board of Education. Published November 18, 2025. Retrieved January 27, 2026. <https://www.youtube.com/watch?v=PX2cx1fB6fk>

through the year 2030.⁴⁷⁷ It is unclear how the Schools Division was operationalizing or accounting for these lack of targets in its Goals and Guardrails work.

In Fall 2025, Dr. Yearwood described his vision for student outcomes with the exam team – one that is centered on individual student growth, particularly in ELA and Math. After the start of Dr. Yearwood’s tenure, Central Office staff echoed this vision in interviews and focus groups with the exam team. He noted the emphasis on student growth as a shift from previous years where student proficiency was the focus. In Winter 2025, Dr. Yearwood shared with the exam team that he wants to see a three percent increase in both proficiency and growth rates for student outcomes this school year. It was reported to the exam team that Dr. Yearwood was planning to take steps to begin a strategic planning process in January 2026, which has the potential to result in a clearer articulation of the District’s priorities related to student outcomes.

While the District’s 2025-26 Comprehensive District Improvement Plan (CDIP) references the Goals and Guardrails throughout, it also states that “JCPS is transitioning from its Goals and Guardrails to a new chapter of growth and improvement.”⁴⁷⁸ The Plan goes on to describe that JCPS is launching Phase One of its Academic Acceleration Plan, including the “Every Student. Every Year.” campaign, which emphasizes one year of academic growth for every student annually.⁴⁷⁹ In Dr. Yearwood’s Superintendent Report during Board meetings, he has referenced one year of academic growth for every student. However, the exam team is not aware of any other publicly available information that has been shared regarding the Academic Acceleration Plan or specifically the “Every Student. Every Year.” campaign.

Recommendations	
9.1.a	The Board, in coordination with JCPS administration and its strategic planning efforts, should determine the role of the Goals and Guardrails as it relates to student outcomes.
9.1.b	JCPS should ensure that any future strategic plan establishes clear academic goals and that measures of success are communicated transparently and consistently with the public, Board, and school-based staff. If new goals and measures of success are adopted, these should be adopted as soon as possible.

More information regarding the Goals and Guardrails can be found in **Chapter 1: District Leadership & Strategy** and **Chapter 2: JCPS Board of Education**.

ACADEMICS & SCHOOLS DIVISIONS

Academics Division

The Academics Division provides job-embedded professional development, Districtwide systems, and on-the-ground support to JCPS teachers and instructional leaders.⁴⁸⁰ The Academics Division is also responsible for providing onboarding and support for the implementation of High-Quality Instructional Resources (HQIRs) across all schools in the District.

As of March 2026, the Academics Division is led by a Chief Academic Officer (CAO). Four assistant superintendents report to the CAO, and they each oversee a team and a distinct portfolio of work (elementary, middle, high, and multilingual learners). The work of supporting schools is primarily executed by content-specific academic specialists and instructional leads. In interviews with the exam team, academic specialists were described as individuals who support principals and system-level change, while

⁴⁷⁷ “Goals & Guardrails.” Jefferson County Board of Education. Published November 12, 2024. Retrieved January 27, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d961aa6c-6589-4634-8ac8-78e1e5fd45b8/JCBOE_Goals_Guardrails_-_Annual_Targets_Int.pdf?disposition=inline

⁴⁷⁸ “Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026.” Jefferson County Public Schools. Retrieved February 24, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hI-ZaNX-dx5N9QfuM7/view>

⁴⁷⁹ Ibid.

⁴⁸⁰ “Academics Division.” Jefferson County Public Schools. Retrieved December 1, 2025. <https://www.jefferson.kyschools.us/page/academics-division>

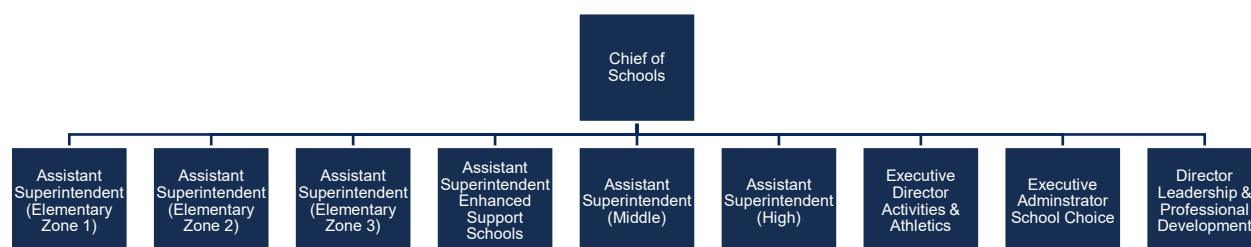
instructional leads directly support teachers and school-based academic instructional coaches (AIC). The Academics Division also includes teams that support programming and initiatives, such as:

- Title I programs
- Professional development and learning
- Fine arts and special areas
- Extended programs, such as Summer Success League
- Academics projects and instructional support
- Language services
- Journey to Success

Schools Division

The Schools Division is primarily responsible for supervising school principals. The Schools Division is led by the Chief of Schools. Six assistant superintendents report to the Chief of Schools and each oversees a “zone” of schools. There are three elementary, one middle, and one high school zone, in addition to a zone for Enhanced Support Schools. Activities & Athletics, School Choice (e.g., JCPS school options), Leadership & Professional Development are other teams housed in the Schools Division, with leaders who directly report to the Chief of Schools.⁴⁸¹

FIGURE 148: JEFFERSON COUNTY PUBLIC SCHOOLS CURRENT SCHOOLS DIVISION ORGANIZATIONAL CHART IN EFFECT FOR FY26



Source: Jefferson County Public Schools website.

Assistant superintendents each have one to two executive administrators who report to them and support with the supervision of principals. The Assistant Superintendent of High Schools also has direct reports that lead Career and Technical Education, Career Academies, Post-Secondary Planning, and School Business Partnerships. More about this work can be found in **Chapter 14: College & Career Readiness**.

During focus groups, principals shared positive remarks regarding the support and level of communication from their supervisors (assistant superintendents and executive administrators). Principals appreciate how information is quickly relayed to them, along with supervisors’ orientations towards support and guidance.

Coordination Across Academics & Schools Divisions

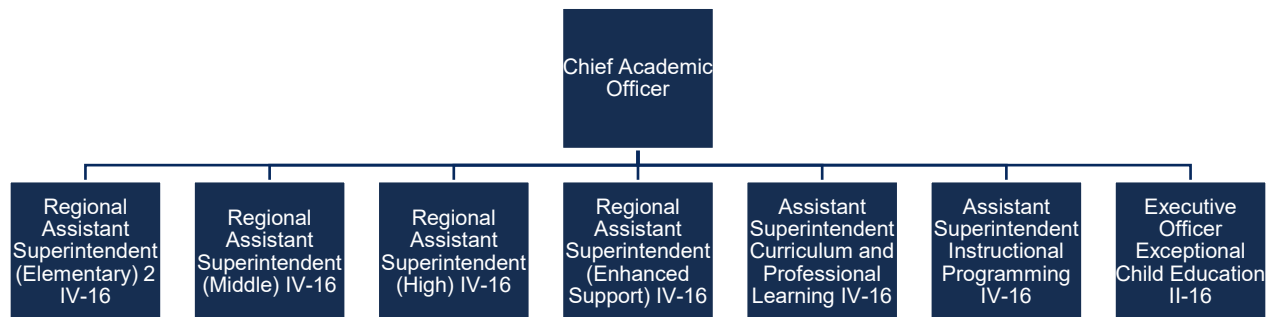
This current organizational structure was created towards the start of Dr. Pollio’s tenure. In 2018, Dr. Pollio requested that the Council of Great City Schools (CGCS) complete an organizational review of JCPS Central Office structures. The review yielded a series of recommendations to enhance the District’s operational efficiency and effectiveness. The review recommended that JCPS create a Chief of Schools position that would report directly to the superintendent, in addition to the pre-existing Chief of Academics

⁴⁸¹ “[Jefferson County Public Schools Organizational Charts](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/31e384d0-ae94-40eb-aecd-b23a8b9c4f07/BOARD-APPROVED-DECEMBER-9%2C-2025.pdf?disposition=inline).” Jefferson County Public Schools. Published December 9, 2025. Retrieved December 31, 2025. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/31e384d0-ae94-40eb-aecd-b23a8b9c4f07/BOARD-APPROVED-DECEMBER-9%2C-2025.pdf?disposition=inline

position. Each of these chiefs would lead a distinct team and portfolio of work.⁴⁸² Dr. Pollio shared with the exam team that the Council's review guided his changes to the Central Office organizational structure. More about the District's current organizational structure is discussed in **Chapter 1: District Leadership & Strategy**. The DEP and ECE Divisions also provide curriculum and instructional supports directly to schools, which means that a total of four divisions provide these types of supports directly to schools.

Under the District's new organizational structure, starting July 1, 2026, the Academics, Schools, and ECE Divisions are set to be merged under the Academics Division led by a CAO. The CAO will have seven direct reports supporting them in leading the division. This includes four regional assistant superintendents who will oversee a portfolio of schools, in addition to two assistant superintendents responsible for curriculum and professional learning and instructional programming. ECE will be led by an Executive Officer of ECE. Figure 149 illustrates this revised reporting structure.

FIGURE 149: JEFFERSON COUNTY PUBLIC SCHOOLS ACADEMICS DIVISION ORGANIZATIONAL CHART, GOING INTO EFFECT FY27



Source: Jefferson County Public Schools website.

Notably, the regional assistant superintendents will now manage both principal supervisors and Instructional Leads positions with a grade-band focus. There was an Assistant Superintendent of Multilingual Learners in the previous organizational chart; in the new structure there will be an Executive Director of Multilingual Learners that reports to the Assistant Superintendent of Instructional Programming.⁴⁸³ The exam team supports the decision to merge the Academics and Schools Division given its comparability to JCPS's peer districts. More discussion on this is included in the **Peer District Organizational Structures** section below. It is still unclear how JCPS plans to fully operationalize curriculum and instruction supports for schools in this new model, and this will be an important component to assessing its effectiveness.

The following sections in this chapter discuss functions and structures based on the organizational charts current through June 30, 2026.

Finding	
9.2	JCPS leadership, Central Office staff, and school principals reported a need for increased collaboration between Central Office divisions that provide support and guidance to schools.

⁴⁸² "An Organizational Review of the Jefferson County Public Schools." Council of the Great City Schools. March 2018. [PDF].

⁴⁸³ "[February 10, 2026 Regular Work Session Meeting](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53174&AgencyTypeID=)." Kentucky School Boards Association. Published February 10, 2026. Retrieved March 3, 2026.
<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53174&AgencyTypeID=>

In exam interviews, cabinet leaders consistently described a “three-legged stool” between the Schools, Academics, and ARSI Divisions. Academics is responsible for creating and providing resources to schools; the Schools Division ensures that the resources are implemented effectively; and ARSI provides data to support continuous improvement practices. Notably, this analogy does not account for the curriculum and instruction services provided by the DEP and ECE Divisions to schools.

Despite articulating this shared “three-legged stool” vision, leadership and staff noted that silos still exist between Academics and Schools. The need for increased collaboration was noted by both Dr. Pollio, Dr. Yearwood, and other Cabinet leaders in interviews with the exam team.

When asked about current collaboration structures, staff frequently cited regular meetings between Schools and Academics. These include regularly held zone-level meetings to discuss data analysis trends at the zone level. Within JCPS, zones are the structure through which the Schools Division provides support to individual schools. Schools are grouped into zones based on factors such as geography, school level, and support needs. Assistant superintendents and executive administrators from the Schools and Academics Divisions attend these meetings, as well as others as needed. Academics staff also described being invited to present at monthly principal meetings that are hosted by the Schools Division. Staff also noted that the level of collaboration varied by zone, depending on the norms and routines established by the respective assistant superintendent. The collaboration structures appeared to be less prescriptive or consistent below the administrator level. It seemed to the exam team that collaboration was done on an as-needed, ad-hoc basis.

In interviews and focus groups, Academics staff described a recently created request-for-support model for schools that had illustrated an opportunity to enhance cross-division collaboration. Specifically, Academics developed a ticketing system to collect school requests, prioritize support based on level of need, and track whether multiple Academics team members were working with the same school. However, the system did not capture support being provided through the Schools Division (e.g. principal supervisors), limiting the District’s ability to coordinate assistance across divisions. This represents a missed opportunity for the Academics and Schools Divisions to align outreach, reduce duplication, and ensure schools receive cohesive Central Office support. Incorporating Schools Division activities could also help Academics more accurately prioritize requests, and principal supervisors could serve as valuable partners in identifying the most appropriate supports for each school.

In focus groups, principals acknowledged that while Central Office supports can be beneficial, there is a significant need for better coordination and streamlined processes between divisions. They pointed out that different divisions work independently and require different plans and reports, creating burdensome reporting requirements for principals. They suggest the need for merging plans and expectations from various departments to foster a coordinated approach to supporting schools.

They noted the following additional areas for improvement:

- **Burdensome Reporting Requirements:** Principals noted the siloed nature of the District, with separate plans and expectations required from different divisions (Academics; DEP; Culture & Climate) resulting in burdensome and/or duplicative reporting requirements.
- **Communication Challenges:** Principals shared that Central Office divisions do not coordinate their communication or requests for schools, which meant that requests could be unnecessarily due at the same time. Moreover, they expressed a lack of “customer service” orientation with schools. They shared their perception that divisions are often asking schools for things, rather than considering how they can serve schools.
- **Feedback from School Visits:** Principals reported that they received walkthrough visits from different Central Office divisions and, in many cases, did not receive timely or actionable written or verbal feedback following these visits. As a result, principals reported that the walkthroughs felt compliance-oriented rather than an opportunity to strengthen instructional systems and day-to-day practice.
- **Feedback and Support Variability:** Principals also pointed out that support from the central office can be inconsistent, with some departments offering substantial assistance while others are less

useful. This inconsistency affects principals' ability to accurately account for the support and resources they will receive from the central office.

Overall, principals highlighted the need for better communication, streamlined processes, and a more cohesive, supportive approach from central office divisions.

Recommendations	
9.2.a	JCPS should consistently use collaboration structures to go beyond division leadership and zone-level meetings. More staff (beyond leadership) should be included in collaboration efforts.
9.2.b	JCPS should develop and implement a shared, cross-division tracking system to coordinate Central Office communication, requests, school visits, and reporting requirements. The system should allow divisions to view and align supports being provided to each school, prioritize assistance based on need, reduce duplicative requests, and ensure schools receive timely, actionable feedback following walkthroughs.

Peer District Organizational Structures

Observation	
9.3	JCPS's current organizational structure includes four chiefs reporting directly to the superintendent, each overseeing curriculum and instruction functions. This is notably higher than most peer districts. The expanded number of leadership roles in JCPS presents challenges for consistency and collaboration in supporting schools.

Figure 150 illustrates the exam team's review of peer district organizational charts, focusing on the placement of leaders responsible for academics, school/principal supervision, exceptional children and special education, as well as diversity, equity, and inclusion within each district's leadership structure.

FIGURE 150: PEER DISTRICT CURRICULUM & INSTRUCTION CABINET POSITIONS

DISTRICT	Number of Roles	Cabinet-Level Roles Related to Curriculum & Instruction
Jefferson County Public Schools	4 direct reports	Interim Chief Academic Officer, Chief of Schools, Chief of Exceptional Children, and Chief of Diversity, Equity, and Poverty all report directly to the superintendent.
Guilford County Schools	1 direct report	Deputy Superintendent, Instructional Leadership and Wellness reports to the superintendent. Principal supervisors; Chief Academic Officer; Chief Exceptional Children and Student Services Officer; and Senior Director, Office of School Improvement all report to the Deputy.
Baltimore City Public Schools	2 direct reports	Chief Academic Officer and Chief of Schools report directly to the superintendent. Executive Director for Special Education reports to the Chief Academic Officer.
Metropolitan Nashville Public Schools	1 direct report	Chief of Academics and Schools reports directly to the superintendent.
Pinellas County School District	4 direct reports	Chief Academic Officer, Minority Achievement Officer, Deputy Superintendent (with a purview for supervising a majority of schools), and Chief Transformation Officer (supervising a portfolio of schools) report directly to the

		superintendent. Executive Director, Exceptional Student Education reports to the Chief Student Support Officer.
Duval County School District	2 direct reports	Chief Academic Officer and Chief of Schools report directly to the superintendent.
San Diego Unified School District	1 direct report	Deputy Superintendent, Instruction reports directly to the Superintendent.

Sources: Jefferson County Public Schools website; Guilford County Schools website; Baltimore City Public Schools website; Metropolitan Nashville Public Schools; Pinellas County School District website; Duval County School District website; San Diego Unified School District website.

The organizational structure of JCPS stands out among peer districts for its number of cabinet-level leaders overseeing curriculum and instruction functions. With four chiefs reporting directly to the superintendent, JCPS has a more distributed leadership model in this area compared to most peer districts, which typically have only one or two direct reports in similar roles. For example, Guilford County Schools and Davidson County Schools operate with a single direct report, while Baltimore City Public Schools and Duval County School District have two. Pinellas County is an outlier amongst the peer districts with four direct reports.

While an expanded leadership structure may offer opportunities for specialized oversight and targeted support, it also introduces challenges related to consistency and collaboration. When multiple cabinet-level leaders share responsibility for curriculum and instruction, it can be more difficult to ensure unified direction, consistent communication, and streamlined support for schools. A district with fewer direct reports may find it easier to maintain alignment and foster collaboration across academic functions. JCPS's new organizational structure is in alignment with the exam team's recommendation; JCPS will only have two such positions, the CAO and the Chief Opportunity and Access Officer (formerly DEP).

Recommendation	
9.3.a	JCPS should continue with its current plan to reduce the number of cabinet-level positions that lead curriculum and instruction functions for the District.

MULTI-TIERED SYSTEMS OF SUPPORT (MTSS)

Overview

MTSS serves as a comprehensive and systematic framework used within JCPS, designed to meet the diverse academic and behavioral needs of students across the District. MTSS emphasizes evidence-based, districtwide practices that address not only academic performance but also social, emotional, and behavioral development. By utilizing a three-tiered approach, MTSS aims to accelerate growth for all learners, ensuring that every student receives the level of support they require.⁴⁸⁴ The three tiers are described in greater detail in Figure 151.

⁴⁸⁴ "Multi-Tiered Systems of Support." JCPS MTSS Website. Retrieved December 18, 2025.
<https://sites.google.com/jefferson.kyschools.us/jcpsmtss/home>

FIGURE 151: MTSS TIERS

TIER	Population	Description
Tier 1 (Core Instruction)	~80%	High-quality, grade-level academic and behavioral instruction in the general education setting
Tier 2 (Targeted / Supplemental Support)	10-15%	Additional, targeted academic and/or behavioral support in small groups alongside Tier 1
Tier 3 (Intensive Intervention)	3-5%	Intensive, individualized instruction and interventions beyond Tiers 1 and 2

Source: KyMTSS “Tiered Delivery System with a Continuum of Supports.”

JCPS has established a comprehensive MTSS Implementation Plan that schools are required to complete. This plan encompasses both academic and behavioral tiers, along with key terms and resources for schools and families. To monitor progress, JCPS provides a template for schools to track individual student interventions and outcomes. Progress monitoring relies on a combination of behavior and academic data, annual Tiered Fidelity Inventory results, and biannual Self-Assessment Surveys. These tools help teams track progress and develop action plans tailored to their school's unique needs. All data regarding referrals to and exits from intervention programs is maintained at the school level according to local data management protocols.⁴⁸⁵ It is unclear the extent to which these MTSS tracking mechanisms are consistently understood and implemented within JCPS schools.

Legislative mandates have further influenced JCPS's implementation strategies. Following Senate Bill 9 in 2022, which mandated all K-12 schools to develop a district-based literacy plan, JCPS aligned its practices with the Kentucky Department of Education's (KDE) guidelines and updated the MTSS Implementation Plan accordingly. Anticipating the requirements of House Bill 162, passed in May 2024 and set to take effect in the 2026-27 school year, JCPS proactively directed all K-12 schools to complete their math plans during the 2024-25 school year. The behavioral aspects of MTSS continue to be documented through prepopulated tools within the implementation plan.⁴⁸⁶

MTSS is also discussed in **Chapter 8: Student Supports, Culture, & Climate** and **Chapter 12: Exceptional Children Education**.

HIGH-QUALITY INSTRUCTIONAL RESOURCE IMPLEMENTATION

Overview

HQIRs are defined by the KDE as instructional materials that are:

- Aligned with Kentucky Academic Standards (KAS)
- Research-based and/or have been validated by outside experts
- Comprehensive and include a variety of engaging content like books, multimedia, as well as tasks and assessments
- Culturally relevant and unbiased
- Accessible to every student⁴⁸⁷

⁴⁸⁵ “JCPS Audit Response: MTSS.” Jefferson County Public Schools. [Microsoft Word]

⁴⁸⁶ Ibid.

⁴⁸⁷ “High-Quality Instructional Resources.” Kentucky Department of Education. Retrieved March 4, 2026. https://www.education.ky.gov/curriculum/standards/kyacadstand/Documents/High-Quality_Instructional_Resources.pdf

These resources equip teachers with evidence-based content, coherent instructional frameworks, and built-in supports that strengthen the rigor and uniformity of teaching practices. When educators use these materials effectively, they can lead to measurable gains in student performance.⁴⁸⁸

Prior to 2022, School-Based Decision Making (SBDM) councils had the authority to select instructional materials. This meant that JCPS schools used a variety of different curriculums, which made it challenging for the Central Office to provide personalized curriculum implementation support to schools. It was also difficult for students who transferred schools mid-year. The passage of Senate Bill 1 (2022) transferred the authority to select textbooks and instructional materials to superintendents while maintaining a process for receiving SBDM and other stakeholder input.⁴⁸⁹

Figure 152 below illustrates JCPS's adoption timeline for HQIRs by grade band and subject.

FIGURE 152: JEFFERSON COUNTY PUBLIC SCHOOLS HQIR IMPLEMENTATION TIMELINE

GRADE BAND	2022-23	2023-24	2024-25	2025-26
Elementary (K-5)	Math			
	ELA			
Middle	Math			
	ELA			
High			Science	
			Math (Alg 1)	
			ELA	
				Math (Alg 2 & Geo)

Source: Jefferson County Public Schools Board of Education Presentation, December 12, 2025.

According to KDE's Curriculum Implementation Framework, district leaders guide HQIR implementation through three stages. In Stage 1 (Launch), they work to ensure readiness by partnering with school leaders on launch logistics and establishing enabling conditions, including systems and structures for professional learning. Stage 2 (Early Implementation) focuses on setting clear expectations, monitoring progress, supporting professional learning, and gathering early data to inform improvements. In Stage 3 (Ongoing Implementation), leaders refine monitoring systems, support smart adjustments to resources, and use data to drive continuous improvement. Throughout all stages, collaboration, feedback, and alignment with instructional goals should be emphasized.⁴⁹⁰

Consistency of Implementation

Observation	
9.4	Teachers are not consistently leveraging HQIR materials and assessment information to provide differentiated small-group instruction to address a range of student needs.

⁴⁸⁸ "Beyond Selection: Rethinking How Districts Adopt Curriculum." Published 2025. Retrieved December 1, 2025.

https://cdn.edreports.org/media/2025/09/Beyond-Selection-September-2025.pdf?_gl=1*1hyfczf*_gcl_au*MTgxMjlyMTcxLjE3NjQwODc2MDM

⁴⁸⁹ "High-Quality Instructional Resource Adoption." Kentucky Department of Education. Published March 3, 2026. Retrieved December 1, 2025. <https://www.education.ky.gov/curriculum/books/Pages/default.aspx>

⁴⁹⁰ "Curriculum Implementation Framework." Kentucky Department of Education. Retrieved December 2, 2026. https://www.education.ky.gov/curriculum/standards/kyacadstand/Documents/Curriculum_Implementation_Framework.pdf

During interviews with the exam team, Central Office staff described several strengths and opportunities for improvement related to HQIR implementation. Staff emphasized the value of consistent lesson delivery across the District. Given JCPS's highly mobile student population, greater consistency in lesson content and structures can help students transition between schools with less disruption and more continuity in instruction. A shared set of materials also enables the Central Office to provide more targeted professional learning and job-embedded support because teachers are working from common instructional resources. Relatedly, staff noted that JCPS developed and implemented a common set of "look-fors" used during school walkthroughs to monitor HQIR implementation. Finally, staff reported that teachers were demonstrating increased comfort with HQIRs over time, reflected in stronger lesson internalization and more consistent whole-group lesson delivery. Despite these reported strengths, school visit data and stakeholder feedback suggest that additional supports are needed to ensure HQIR implementation translates into consistently rigorous, engaging instruction for all learners.

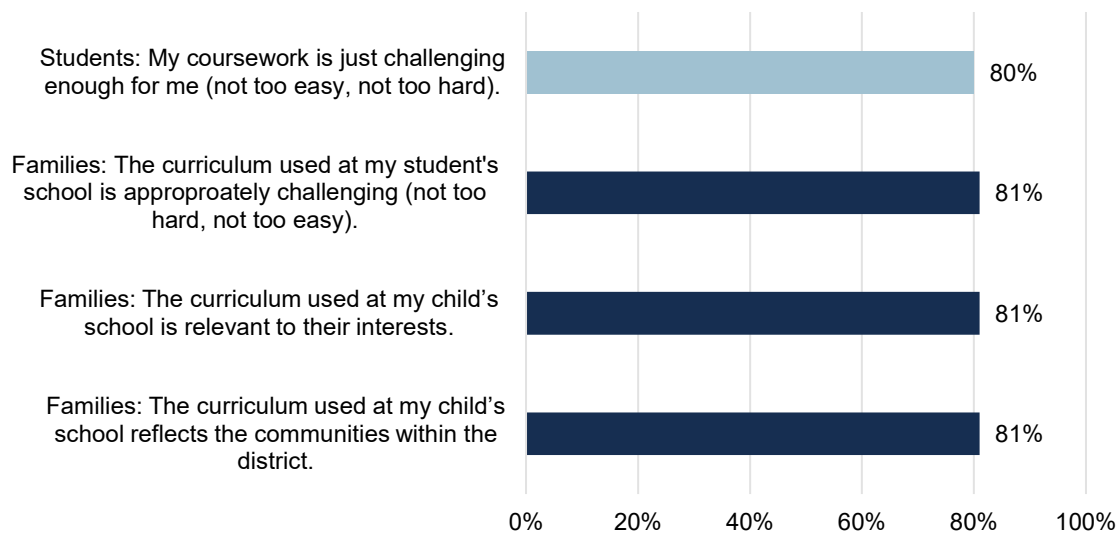
A primary area for improvement identified in interviews, and observed by the exam team during school visits, was the limited use of differentiated small-group instruction to support students at varying levels. While whole-group lesson delivery was more consistently observed, teachers did not consistently leverage HQIR materials and assessment information to form targeted groups, provide scaffolded instruction, and deliver additional practice or re-teaching in small-group settings.

Staff also described a few other areas of growth. These included uneven educator buy-in and instructional shifts (particularly at the high school level), constraints on the District's capacity to provide consistent coaching across all schools, and barriers to teacher participation in professional learning due to time and competing responsibilities. Staff also noted that schools did not consistently use available HQIR-related data to support actionable planning and adjustments to instruction.

To further contextualize HQIR implementation, the exam team's student, staff, and family surveys asked about access to instructional materials and perceptions of coursework. According to the staff survey, 84% of respondents who were school-based staff agreed that they had access to appropriate learning materials and textbooks.

The exam team's survey did not ask students or families about HQIRs specifically; however, both groups were asked whether coursework was appropriately challenging. As shown in Figure 153, students and families responded similarly, with approximately 80% of each group agreeing that the level of challenge of coursework and curriculum at their school was appropriate. Agreement rates indicate that most respondents were satisfied with the rigor of the curriculum being used. Additionally, 81% of family respondents agreed the curriculum used at their child's school was both relevant to their interests and reflective of the communities within the District.

FIGURE 153: STUDENT AND FAMILY PERCEPTIONS OF COURSEWORK RIGOR



Source: Special Examination Survey.

Recommendation	
9.4.a	JCPS should strengthen HQIR implementation supports by providing clearer guidance and coaching to help teachers differentiate lessons to meet students' needs. This includes showing teachers what effective small-group instruction looks like, how to use student information to group students, and how to plan extra support for students who need it. JCPS should also ensure that teachers receive regular feedback on both whole-group lesson delivery and differentiated instruction.

CLASSROOM INSTRUCTION

Overview

High-quality instructional resources are essential for strong classroom instruction; however, it is the expertise and skill of teachers that animate these materials and create engaging, effective learning environments for students. Research demonstrates that effective teaching practices fall within six main categories:

- **Preparation and Planning:** Demonstrate and apply content knowledge and teaching methods, design lessons that are standards aligned, and make use of HQIRs.
- **Professionalism and Collaboration:** Participate in professional learning, collaborate with colleagues, and communicate regularly with families.
- **Learning Environment:** Build strong, positive relationships with students and cultivate a classroom environment that is supportive and affirming of each unique student.
- **Teacher Expectations:** Maintain high expectations for all students.
- **Instructional Delivery:** Use evidence-based instructional practices and adapt methods to address the diverse needs of students.
- **Assessment and Feedback:** Provide timely and constructive feedback on student performance on a regular basis that drive adjustments to instruction.⁴⁹¹

⁴⁹¹ “[Elements of Effective Teaching](https://ies.ed.gov/sites/default/files/migrated/rel/regions/northwest/pdf/230628_Elements-of-Effective-Teaching_Ask-An-Expert-ADA.pdf).” Institute of Education Sciences. Retrieved December 2, 2025.
https://ies.ed.gov/sites/default/files/migrated/rel/regions/northwest/pdf/230628_Elements-of-Effective-Teaching_Ask-An-Expert-ADA.pdf

The next section discusses the extent to which four of these categories (learning environment, teacher expectations, instructional delivery, and assessment and feedback) were present in JCPS classrooms during the exam team’s school visits and based on the perceptions of JCPS student, staff, and families.

In April and September 2025, members of the exam team observed 44 classrooms across 22 schools for approximately 15 minutes per class. The examiners used a structured School Walkthrough Tool to assess whether a series of core practices were observed, not observed, or not applicable (N/A). Each section of the tool, informed by the Equity Institute’s Culturally Responsive Walkthrough Tool and the Texas State University’s School Safety and Security Audit Toolkit, included a checklist series of core practices that the exam team was looking for, tied to a particular evidence-based strategy. More information regarding the exam team’s approach can be found in **Project Background & Methodology**.

Teacher Expectations

Teachers who hold students to high expectations are a critical component of ensuring that students have rigorous academic experiences. Specifically, high expectations should apply to every student, with the aim of helping all learners reach grade-level standards. A recent study found that students in classrooms where teachers held the highest expectations (the top quartile) made learning gains equivalent to about five additional months of learning, compared to those in classrooms where teacher expectations were lowest (the bottom quartile).⁴⁹²

Finding	
9.5	One in four teachers observed by the exam team did not demonstrate high expectations for students. School-based respondents on the staff survey reported similar perceptions; 25% did not agree that JCPS students were held to high expectations.

Figure 154 illustrates that, in classrooms observed by the exam team, one-fourth of teachers did not demonstrate high expectations for all students. In some classrooms, the exam team observed students who were not participating in the whole-group activity and teachers did not take action to engage them in grade-level tasks. Setting and maintaining high expectations can be especially complex in classrooms with diverse learning and language needs, including multilingual learners (MLs) at varying English proficiency levels and students with disabilities who require accommodations and/or modifications. In these contexts, teachers must balance maintaining the rigor of the intended learning target with providing appropriate scaffolds (e.g., clear success criteria, multiple means of access to content, structured opportunities to participate, and targeted checks for understanding) so that all students can meaningfully engage and demonstrate learning.

In addition, 30% of observed teachers did not provide clear and transparent success criteria for the lesson. Two activities included in the JCPS Instructional Systems Monitoring Tool (ISMT) relate to this item — teachers are expected to unpack HQIR learning targets with students daily and reference the learning targets throughout the lesson.⁴⁹³ A key foundation for setting high expectations is ensuring that students clearly understand the standards and goals they are working toward.

⁴⁹² “[The Opportunity Myth](https://tntp.org/wp-content/uploads/2023/02/TNTP_The-Opportunity-Myth_Web.pdf).” The New Teacher Project. Retrieved December 2, 2025. https://tntp.org/wp-content/uploads/2023/02/TNTP_The-Opportunity-Myth_Web.pdf
⁴⁹³ “25-26 – JCPS Instructional Systems Monitoring Tool.” Jefferson County Public Schools. [Google Sheet].

FIGURE 154: EXAM TEAM SCHOOL VISITS - CLASSROOM EXPECTATIONS, APRIL 2025 VISIT

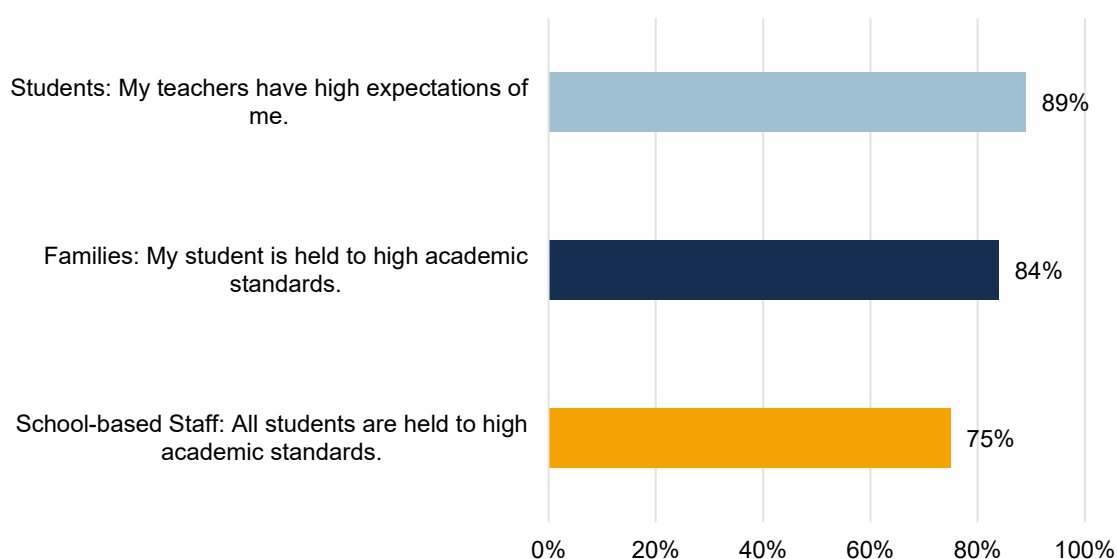
EVIDENCE-BASED STRATEGY	Focus Area	Core Practice	Percent of Classrooms in Sample Demonstrating This Practice
Expectations for achievement are clear, and lesson design allows all students to engage with instructional tasks and to give and receive feedback.	Observed Teacher Actions	Teachers demonstrate high expectations for all students.	75%
		Teachers provide clear and transparent success criteria for the day's lesson.	70%

Source: Exam team school visits.

As demonstrated in Figure 155, three-fourths of school-based respondents on the staff survey agreed that all students are held to high academic standards. This differed from the perceptions of students and families. Almost 90% of students agreed that their teachers have high expectations for them, while 84% of families agreed that their students are held to high academic standards.

According to open-ended comments on the staff survey, school-based respondents shared that there were inconsistencies among expectations for students, particularly related to academic benchmarks and discipline. They shared that some classrooms hold high expectations, while in others, disruptive behavior and not engaging in the material goes unaddressed, which undermines these standards. More about student discipline is discussed in **Chapter 8: Student Supports, Culture, & Climate**.

FIGURE 155: STUDENT, FAMILY, AND SCHOOL-BASED STAFF PERCEPTIONS OF EXPECTATIONS AND ACADEMIC STANDARDS



Source: Special Examination Survey.

Recommendation	
9.5.a	JCPS should, where needed, provide coaching and support that equips teachers to set and maintain high expectations for all students, particularly in classrooms serving diverse learners, including multilingual learners and students with disabilities.

Instructional Delivery

Instructional delivery refers to the methods and strategies teachers use to present content, engage students, and facilitate learning in the classroom. This includes how teachers organize lessons, use instructional materials, adapt their approaches to meet diverse student needs, and implement evidence-based practices to ensure students are actively learning and achieving academic goals.

Findings	
9.6	Based on exam team school visits, classroom instruction in many observed settings was marked by limited student engagement, reliance on basic recall-level activities, and superficial use of curriculum materials. Few lessons demonstrated deep conceptual understanding or critical thinking, and some teachers appeared uncertain or lacked clarity regarding curriculum content.
9.7	The exam team observed frequent use of Chromebooks (e.g. laptops) for instructional purposes during school visits. This usage did not appear to support high-quality instruction or student engagement.

Figure 156 shows classroom visit data around teacher and student actions that are related to instructional delivery. Of the classrooms observed, just over half of teachers provided HQIRs that engaged their students in grade-level content. Teachers generally did a good job providing feedback to students in small- and whole-group settings.

Core practices were observed at a lower rate for student actions. Just over two-thirds of the observed classrooms provided opportunities for students to reflect on their own learning behaviors. In less than half of the classrooms observed, students were provided opportunities to lead components of the lesson, engage with success criteria, and practice giving and receiving feedback. With the exception of two classes that were visited, students were not provided with an opportunity to contribute to setting success criteria for the observed lesson.

Instruction, overall, was an area of concern with many classrooms characterized by basic recall-level instruction, low student engagement with teachers and peers, and superficial use of curriculum materials. Few of the observed lessons demonstrated deep conceptual understanding or critical thinking, and some teachers appeared unconfident or unclear on the content of the curriculum. The exam team observed several occasions where Chromebooks were used for instructional purposes. Students often appeared disengaged with the activities on their Chromebook, and the teacher was not using the time to provide differentiated instruction to small groups of students. Relatedly, the exam team heard similar feedback during family focus groups — families noted the lack of engagement associated with the overuse of Chromebooks.

The exam team observed a number of classrooms with MLs at different English proficiency levels. In these classrooms, teachers were not using strategies to support MLs and their language needs. This includes strategies like using visual cues, chunking directions, teaching and reusing standard sentence starters or discussion protocols, and intentionally pairing students. One activity included in the JCPS ISMT relates to this item — teachers are expected to provide differentiated acceleration strategies to support students during class.⁴⁹⁴

Some school leaders described having long-tenured staff, while others (particularly in Enhanced Support Zone schools) mentioned they have had to navigate challenges associated with high teacher turnover and long-term substitutes. Several school leaders also explained challenges with hiring enough Special Education and English Language Development (ELD) teachers, as well as teachers in certain Science and Career Technical Education (CTE) courses.

⁴⁹⁴ “25-26 – JCPS Instructional Systems Monitoring Tool.” Jefferson County Public Schools. [Google Sheet].

Mentoring structures for new teachers and principals were noted a couple of times as inconsistent by school leaders who shared that state and District funding for these types of programs have lapsed. More information on mentoring supports is shared in **Chapter 5: Human Resources**.

FIGURE 156: EXAM TEAM SCHOOL VISITS - INSTRUCTIONAL DELIVERY

EVIDENCE BASED STRATEGY	Focus Area	Core Practice	Percent of classrooms in the sample demonstrating this practice
Expectations for achievement are clear, and lesson design allows all students to engage with instructional tasks and to give and receive feedback.	Observed Teacher Actions	Teacher provides feedback to students in whole- and small-group settings using the appropriate modalities (verbal, assistive tech., ASL, AAC).	80%
		Teacher provides high-quality instructional resources that engage students in grade-level content.	59%
		Teacher creates opportunities for students to provide peer-feedback. (Spring Visits Only)	47%
		Teacher embeds student accommodations and modifications within the context of the environment and instructional routines. (Fall Visits Only)	38%
	Observed Student Actions	Students communicate with other students appropriate modalities (e.g. verbal, assistive tech., ASL, AAC) (Fall Visits Only)	75%
		Students provided opportunities to reflect on their own learning and behavior. (Spring Visits Only)	69%
		Students provided opportunities to lead components of the lesson.	36%
		Students practice giving and receiving feedback in whole-or small-groups. (Spring Visits Only)	36%
		Students engage with success criteria through self- or peer-reflection.	27%
		Students are provided with an opportunity to contribute to setting success criteria.	5%

Source: Exam team school visits.

According to the exam team's student survey, two-thirds of respondents reported that their teacher(s) change teaching methods, practices, and/or lessons based on their needs. It is notable that one-third of respondents did not share this view. This data suggests that a significant portion of students may not be experiencing differentiated instruction or responsive teaching practices in their classrooms. The lack of instructional adjustment for these students could contribute to disengagement and missed learning opportunities.

Class size (i.e., the number of students in a classroom) can affect how well teachers are positioned to provide individualized support. On the exam team's student survey, 84% of respondents agreed that the number of students in their class was "just right" for receiving support from their teacher.

Similarly, the exam team's staff survey revealed that just over 60% of school-based staff across all school levels (elementary, middle, and high) agreed that students are engaged during class time. This means that nearly 40% of staff respondents did not share this perception. The fact that a substantial proportion of staff are not observing consistent student engagement may point to underlying challenges in instructional practices. This gap in perceived engagement could signal that some students are not fully participating in learning activities, which may impact their academic progress and overall classroom climate.

Recommendations	
9.6.a	JCPS should enhance its professional development and coaching offerings to increase student engagement, promote deeper conceptual understanding, and foster critical thinking in classroom instruction. This support should include strategies for effective use of curriculum materials, lesson planning that moves beyond recall-level activities, and ongoing opportunities for teachers to build confidence and clarity in HQIR content.
9.7.a	JCPS should establish and implement clear expectations and supports for effective instructional technology use, including guidance on when and how Chromebooks should be used to advance rigorous, standards-aligned instruction and active student engagement.

Learning Environment

The learning environment refers to the overall atmosphere, physical space, and culture within a classroom that shapes how students interact and learn. It includes the relationships between teachers and students, the classroom routines, the resources available, and the ways in which students feel supported, respected, and motivated to engage in learning. A positive learning environment is characterized by safety, respect, collaboration, and opportunities for students to reflect on their learning and behavior.

Finding	
9.8	Learning environment indicators from the exam team's school visits illustrate that while many classrooms demonstrated a generally respectful and orderly climate, students were not consistently positioned to lead or sustain academic discourse with their peers. Classroom routines and norms were not consistently leveraged to promote student agency and peer-to-peer discourse.

Language & Respect in the Learning Environment

As seen in Figure 157, most of the classrooms observed by the exam team demonstrated core practices around fostering a safe and productive learning environment through respectful language and advocacy for support. Over 80% of teachers encouraged students to independently seek support and used language that affirmed and encouraged all students to think critically. Only 63%, however, addressed student behaviors proactively and respectfully.

While over 90% of classrooms observed demonstrated students using age-appropriate language, fewer demonstrated core practices around students supporting each other to complete tasks (59%), using available resources to navigate assigned learning activities (68%), and having opportunities to reflect on their own learning and behavior (38%). An activity included in the JCPS ISMT relates to this item — teachers are expected to cultivate student-centered learning experiences with student-to-student discourse.⁴⁹⁵

⁴⁹⁵ "25-26 – JCPS Instructional Systems Monitoring Tool." Jefferson County Public Schools. [Google Sheet].

FIGURE 157: EXAM TEAM SCHOOL VISITS - LANGUAGE AND RESPECT IN THE LEARNING ENVIRONMENT

EVIDENCE BASED STRATEGY	Focus Area	Core Practice	Percent of classrooms in sample demonstrating this practice
Learning environment demonstrates safety and productivity through respectful language and advocacy for support when needed.	Observed Teacher Actions	Teacher encourages students to independently seek support, when needed, through available resources in the classroom (e.g., peers, tools, etc.).	84%
		Teachers use language that affirms and encourages all students to think critically and to do their best work.	80%
		Teacher addresses student behaviors proactively and respectfully. (Fall Visits Only)	63%
	Observed Student Actions	Students use affirming, age-appropriate language when interacting with teacher and peers during the lesson.	93%
		Students use available classroom resources (e.g., wall signage, texts) to independently navigate assigned learning activities.	68%
		Students support each other to complete tasks.	59%
		Students provided opportunities to reflect on their own learning and behavior. (Fall Visits Only)	38%

Source: Exam team school visits.

According to the exam team's student survey, 77% of respondents agreed that teachers and staff treat all students with respect. This survey result substantiates the exam team's observations of use of respectful language in the classroom environment.

Routines in the Learning Environment

As shown in Figure 158, in 80% or more of classroom observations, students were able to work for appropriate periods of time without directions from the teacher and engaged cooperatively and collaboratively in their learning. Given the exam team's brief classroom observation windows, this percentage is unsurprising and should be interpreted with caution.

Regarding teacher actions, just half of teachers observed used multiple areas of the classroom to engage students, and around the same number used formative and/or summative assessments to determine whether students met intended learning outcomes. Notably, the exam team observed that many of the schools had facility limitations that did not allow teachers and students to use multiple parts of the room.

FIGURE 158: EXAM TEAM SCHOOL VISITS - ROUTINES IN THE LEARNING ENVIRONMENT

EVIDENCE BASED STRATEGY	Focus Area	Core Practice	Percent of classrooms in sample demonstrating this practice
Learning environment demonstrates safety and productivity through established routines that allow students to maximize learning time.	Observed Teacher Actions	Teacher creates learning groups in which all students learn to work collaboratively and independently.	68%
		Teachers use formative and/or summative assessments to determine whether students met intended learning outcomes.	50%
		Teacher uses multiple areas in the classroom to engage students in learning activities.	50%
		Students engage cooperatively and collaboratively in their learning.	86%
	Observed Student Action	Students can work for appropriate periods of time without direct teacher directions.	80%
		Students transition to areas of the classroom with minimal disruption and direction.	57%
		Students complete assigned assessments during the allotted time	36%

Source: Exam team school visits.

Recommendation	
9.8.a	JCPS should strengthen Tier 1 instructional expectations and coaching to increase student-led academic discourse and peer-to-peer collaboration (e.g., structured academic talk routines, discussion protocols, and student roles that require students to explain thinking, ask questions, and respond to peers), supported by consistent classroom norms and routines that build student agency (e.g., independent use of classroom resources, peer support to complete tasks, proactive and respectful behavior management, and regular opportunities for student reflection).

JOURNEY TO SUCCESS

Journey to Success is JCPS's framework for defining and measuring student success from Kindergarten through graduation. The framework is used to demonstrate how students develop essential skills over time. Journey to Success builds on and replaces JCPS's Backpack to Success Skills initiative, launched in 2018. Students are asked to actively reflect on their learning, collect evidence of their growth, and explain how their experiences help them build the district's five Success Skills:

- **Prepared and Resilient Learner:** Navigates challenges with adaptability, persistence, and purpose.
- **Productive Collaborator:** Engages respectfully with others to move shared work forward.
- **Emerging Innovator:** Explores ideas and creates solutions through curiosity and initiative.
- **Effective Communicator:** Conveys meaning clearly using appropriate voice, format, and tools.
- **Globally and Culturally Competent Citizen:** Acts with awareness, respect, and responsibility in a diverse world.

Students participate in Milestone experiences and Defenses of Learning that allow them to showcase their progress in developing these five Success Skills. Milestones occur in non-transition years and may take the form of a Mini-Defense, Student-Led Conference, or Exhibition of Learning, serving as practice and preparation for the more formal Defenses of Learning completed in fifth, eighth, and twelfth grades. During a Defense of Learning, students present selected artifacts, including examples of high-quality work from academic or real-world experiences, and explain how those artifacts demonstrate growth in each Success Skill. Student performance is evaluated using Districtwide rubrics that define expectations and “look-fors” for evaluators. The District also provides reflection prompts and artifact rubrics to guide students in selecting meaningful artifacts.⁴⁹⁶ In interviews with Central Office staff, it was noted that the use of standard rubrics was an improvement from Backpack to Success Skills. While the exam team did observe a few examples of students working on various Journey to Success activities, the exam team did not observe the use of the rubrics in action and cannot comment on how they are implemented in practice.

According to the exam team’s staff survey, just over 60% of respondents across all school levels (elementary, middle, and high) agreed that Journey to Success helps all students engage in student-driven learning. This illustrates that there is perhaps more work that needs to be done to ensure that all schools have the resources they need to implement Journey to Success with fidelity.

⁴⁹⁶ “[Journey to Success](https://drive.google.com/file/d/1jVa2zPFdm0UcyCUvS6W5auKOWzrAhLBm/view),” Jefferson County Public Schools. Published July 2024. Retrieved March 4, 2026. <https://drive.google.com/file/d/1jVa2zPFdm0UcyCUvS6W5auKOWzrAhLBm/view>

CHAPTER 10: ASSESSMENTS, ACCOUNTABILITY, & SYSTEMS IMPROVEMENT

OVERVIEW

This chapter outlines practices, programs, and initiatives related to student assessments, school accountability, and systems improvement within JCPS. The Accountability, Research, and Systems Improvement (ARSI) Division primarily oversees this body of work, with support from the Schools, Academics, and Exceptional Children Education (ECE) Divisions. The ARSI Division in JCPS is comprised of approximately 30 employees across multiple units with direct reporting relationships on the organizational chart:

FIGURE 159: ARSI DIVISION ORGANIZATIONAL CHART



Source: Jefferson County Public Schools ARSI Central Office Organizational Charts.

A Chief serves as the head of the Division within the Superintendent's Cabinet. In December 2025, this role transitioned to an interim chief following a change in personnel. Under the organizational restructuring set to go into effect on July 1, 2026, the Chief position has been reclassified as an Executive Officer of Accountability, Research, and Systems Improvement; the ARSI division structure remains largely intact in the restructuring. The ARSI Division's website explains their mission is to advance research, apply knowledge, and secure resources to inspire learning by providing services in five areas⁴⁹⁷:

- Accountability and Data Systems
- Research and Evaluation
- Systems Improvement
- Resource Development
- Testing

The ARSI Division supports the District by managing assessments, data collection, analysis, and reporting. It ensures a transparent data process for internal use and public accountability. A review of peer district organizational charts indicates that most large, urban public-school districts maintain a centralized department, division, or unit responsible for data, accountability, and research, though titles and scope vary.

The following sections review how the division's structures and processes contribute to continuous improvement and assess whether accountability data indicates the District is achieving its goals.

⁴⁹⁷ "Accountability, Research, and Systems Improvement (ARSI) Department Page." JCPS ARSI. Retrieved March 18, 2025. <https://sites.google.com/jefferson.kyschools.us/research/home>

ASSESSMENT SYSTEM

In a public school district, assessments are a critical tool for understanding whether students are learning the knowledge and skills expected at each grade level and for identifying where additional instructional support is needed. When implemented as part of a balanced system, assessment results provide a common, comparable source of evidence to inform classroom practice, monitor growth over time, communicate progress to families and the community, and meet state and federal reporting requirements. An assessment system serves not only a compliance function, but also a core continuous-improvement function — helping district and school leaders target resources, evaluate the effectiveness of programs and strategies, and ensure that all students have access to rigorous learning opportunities.

The Testing Unit within ARSI is the team that primarily oversees the administration of student assessments. The District Assessment Coordinator (DAC) or “Manager, Testing” leads this team, which includes three data management research technicians (DMRT), a clerk, and a technician for assessment reporting. At the school level, there are building assessment coordinators (BAC), who are the Testing Unit’s main points of contact and are responsible for testing administration on their campuses. This includes analyzing test data, developing school-level and District-level reports, and training school testing coordinators.⁴⁹⁸ The Testing Unit is supported by ARSI staff in the Research & Systems Improvement Unit, who clean and quality-check assessment data and lead reporting processes. The Testing Unit remains in ARSI under the planned 2026 Central Office reorganization.

The District’s assessment system mainly includes the tests shown in Figure 160, which are either mandated by state or federal agencies or selected by the District. These tests provide formative, interim, and summative data, helping the District track student growth and achievement across grade levels.

FIGURE 160: JEFFERSON COUNTY PUBLIC SCHOOLS ASSESSMENT SYSTEM

ASSESSMENT	Grades	Required	Purpose
National Assessment of Educational Progress (NAEP) / Trial Urban District Assessment (TUDA)	Sampled grades	District opts-in to federal assessment	National benchmarking
Kentucky Summative Assessment (KSA)	3–8, 10, 11	State required	State and federal accountability
Alternate KSA (AKSA)	3–8, 10, 11	State required (for eligible students)	State and federal accountability
ACT (Prior to 2026) SAT (Starting 2026)	11	State required	College readiness
WIDA Assessing Comprehension and Communication in English State-to-State (ACCESS) for ELLs	K–12 ELs	State required	English proficiency
BRIGANCE Early Childhood Kindergarten Screen III	K	State required	Early learning readiness
Measures of Academic Progress (MAP) Growth	K-8	District opts to administer locally	Student growth
College Equipped Readiness Tool (CERT)	9-11 (12 - optional)	District opts to administer locally	College and Career Readiness

Source: Jefferson County Public Schools 2025-2026 System Wide Assessment Calendar.

JCPS is responsible for administering state-required student assessments. Specifically, ARSI coordinates and supports the administration of the KSA, AKSA, and the college admissions exam in 11th grade. The goal of KSA and AKSA assessments are to measure student proficiency against the state grade-level academic standards. Summative assessments are administered in grades 3-8, 10, and 11 in Reading, Math, Science, Social Studies, and Writing. JCPS is also responsible for administering the WIDA ACCESS,

⁴⁹⁸ “[Accountability, Research, & Systems Improvement Division: Assessment Page.](https://www.jefferson.kyschools.us/page/assessment)” Jefferson County Public Schools. Retrieved February 25, 2026. <https://www.jefferson.kyschools.us/page/assessment>

which includes English language proficiency assessments for Multilingual Learners (MLs) and the Kindergarten entry screener (the BRIGANCE Early Childhood Kindergarten Screen III).⁴⁹⁹

The Academics, Schools, and ECE Divisions also support schools in administering District-level student assessments. For example, the Academics Division oversees the coordination and administration of the MAP assessments and the CERT. JCPS's assessments include interim or formative assessments that measure student learning and growth during the school year. The Kentucky Department of Education (KDE) encourages districts to use such measures as part of a balanced assessment system.⁵⁰⁰

- JCPS administers the MAP Growth assessment three times per year (fall, winter, and spring) in kindergarten through eighth grade. MAP Growth is widely used across Kentucky. As of spring 2022, 54% of districts in the Commonwealth reported using it.⁵⁰¹
- JCPS also administers the CERT assessment three times per year to high school students to measure college and career readiness.
- Finally, JCPS uses Capti ReadBasix and MAP Reading Fluency as diagnostic literacy assessments for students who fall below a certain percentile on MAP Growth or CERT assessments.

The next sections will cover the District's guidelines for conducting specific assessments and show how the District performed according to the available data for each assessment.

National Assessment of Educational Progress (NAEP) Results

Finding	
10.1	JCPS has experienced a sharper and more sustained decline in NAEP proficiency rates since the COVID-19 pandemic than many of its peer districts, particularly in fourth-grade Reading and eighth-grade Mathematics and Reading.

The National Assessment of Educational Progress (NAEP) is a congressionally mandated assessment administered nationwide. Results are reported at the state level and, in some cases, for participating districts.⁵⁰² States receiving Title I funds are required to participate in NAEP reading and mathematics assessments at grades 4 and 8. However, NAEP is sample-based; participation at the district level is not universal. Only districts selected as part of NAEP's sampling design or participating in the Trial Urban District Assessment (TUDA) are required to administer NAEP.

JCPS opted into TUDA in 2009. By opting in, a district gains access to an independent, nationally comparable benchmark of student achievement for large urban systems. TUDA enables meaningful comparisons to peer districts, the state, and the nation using a common assessment framework, without attaching stakes to students or educators. The resulting data support evidence-based decision-making, strengthen transparency and credibility, and places the District's progress within a broader national urban context.⁵⁰³

⁴⁹⁹ "Statewide Assessment Information." Jefferson County Public Schools. Retrieved February 25, 2026.

<https://www.jefferson.kyschools.us/page/statewide-assessment-information>

⁵⁰⁰ "Model Curriculum Framework." Kentucky Department of Education. Published April 2023. Retrieved February 26, 2026.

https://www.education.ky.gov/curriculum/standards/kyacadstand/Documents/MCF_Section_3_Balanced_Assessment.pdf

⁵⁰¹ "Predicting Proficiency on the Kentucky Summative Assessment (KSA) based on NWEA MAP Growth Scores."

NWEA Psychometric Solutions. Published March 2023. Retrieved March 18, 2026.

<https://www.nwea.org/uploads/KY-MAP-Growth-Linking-Study-Report-2023-03-24.pdf>

⁵⁰² "About NAEP." National Center for Education Statistics. Retrieved March 2, 2026.

<https://nces.ed.gov/nationsreportcard/about/>

⁵⁰³ "Trial Urban District Assessment (TUDA)." National Center for Education Statistics. Retrieved March 18, 2026.

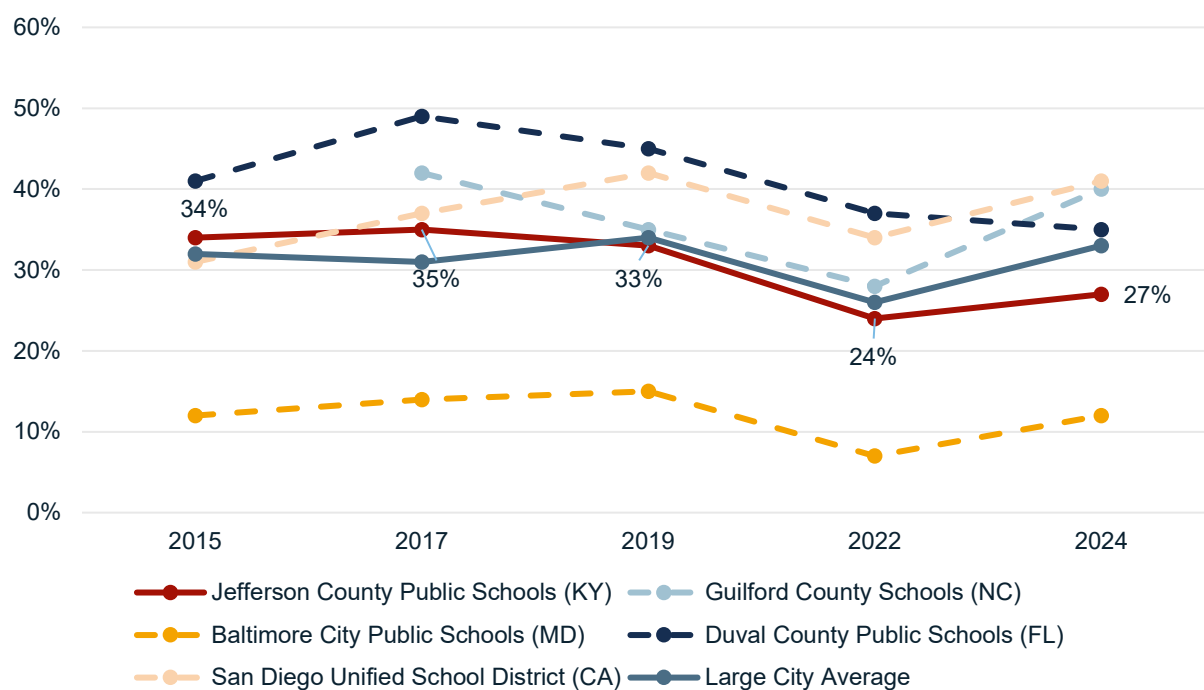
<https://nces.ed.gov/nationsreportcard/tuda/>

Figure 161, Figure 162, Figure 163, and Figure 164 present NAEP proficiency rates for JCPS and its peer districts from 2015 to 2024. Specifically, the exam team examined JCPS's performance on the fourth- and eighth-grade Reading and Mathematics NAEP assessments. It should be noted that data was not available for all years shown for Guilford County.

Fourth Grade Results

Figure 161 shows fourth-grade Mathematics proficiency rates for JCPS and its peer districts over time. Across the years shown, JCPS generally underperformed most peer districts in fourth-grade Mathematics, excluding Baltimore City Schools. JCPS outperformed the Large City Average in 2015 and 2017; however, from 2019 to 2024, JCPS has fallen further behind, with the performance gap widening over time. JCPS also experienced the steepest decline in Mathematics proficiency immediately following the COVID-19 pandemic. Among peer districts that improved after 2022, JCPS saw the smallest gain and was one of three districts that did not return to pre-pandemic proficiency rates by 2024, resulting in the second-lowest proficiency rate among the peer districts. When comparing JCPS with statewide Kentucky results, Kentucky has nearly returned to its pre-pandemic proficiency rates from 2019 to 2024, while JCPS remains six percentage points below its 2019 level in 2024.⁵⁰⁴

FIGURE 161: PERCENT OF STUDENTS IDENTIFIED AS PROFICIENT OR ABOVE ON FOURTH GRADE MATHEMATICS NAEP, 2015-2024



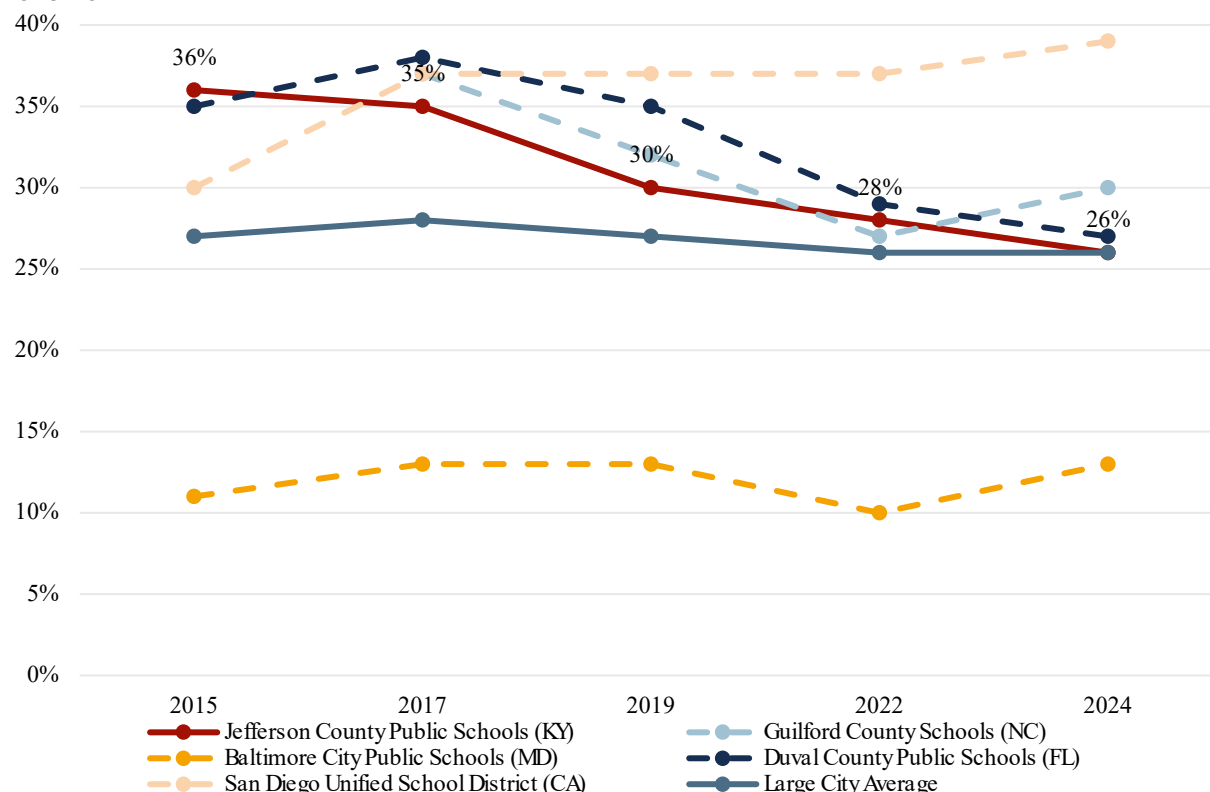
Source: Nation's Report Card website.

Figure 162 demonstrates fourth-grade Reading proficiency rates in JCPS and its peer districts over time. Since 2015, JCPS has shown a continued decrease in fourth-grade Reading proficiency and has generally scored below most of its peer districts since 2017, excluding Baltimore City Schools. Notably, JCPS outperformed the Large City Average through 2022; however, by 2024, both JCPS and the Large City Average achieved the same proficiency rate (26%). Although JCPS and all peer districts had a decrease in fourth grade Reading proficiency after the COVID-19 pandemic, JCPS is one of two districts that continued

⁵⁰⁴ "State and Urban Districts Snapshots." National Center for Education Statistics. Retrieved March 19, 2026. <https://nces.ed.gov/nationsreportcard/snapshots/>

to see decreases in proficiency and has the second lowest proficiency rate amongst peer districts in 2024. Kentucky's statewide proficiency rate increased by two percentage points from 2022 to 2024, while JCPS's proficiency rate decreased by two percentage points over the same time period.⁵⁰⁵

FIGURE 162: PERCENT OF STUDENTS IDENTIFIED AS PROFICIENT OR ABOVE ON FOURTH GRADE READING NAEP, 2015-2024



Source: Nation's Report Card website

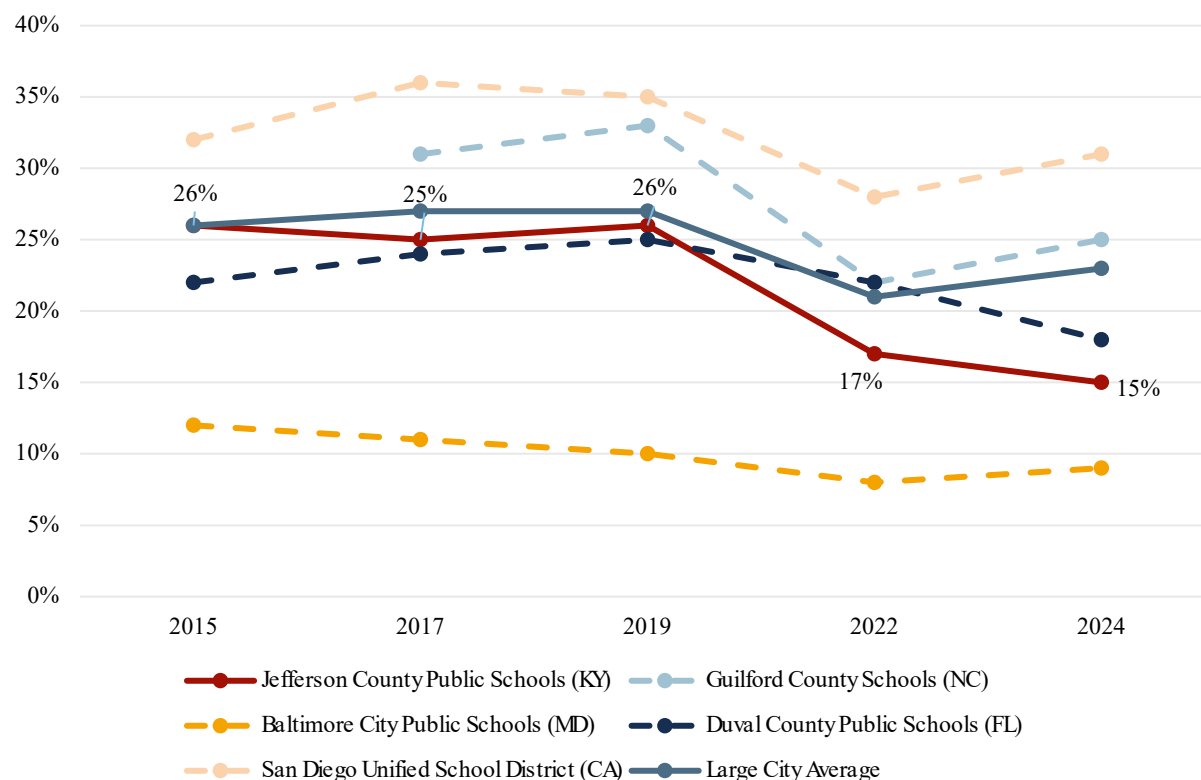
Eighth Grade Results

Figure 163 shows eighth-grade Mathematics proficiency rates for JCPS and its peer districts over time. From 2015 to 2019, JCPS performance was relatively stable, with 25% to 26% of eighth-grade students scoring at least Proficient in Mathematics, placing the District in the middle of its peer group. Following the COVID-19 pandemic, all districts experienced a notable drop in performance. However, JCPS is one of only two districts that has continued to decline in eighth-grade Mathematics proficiency since 2019. In 2024, it ranks as the second-lowest proficiency rate among the districts shown. JCPS performed similarly to the Large City Average from 2015 to 2019, however the gap widened in 2022 and again in 2024, leaving JCPS eight percentage points below the Large City Average. In 2024, Kentucky's statewide proficiency rate was four percentage points lower than 2019. By comparison, JCPS was 11 percentage points below its 2019 result in 2024.⁵⁰⁶

⁵⁰⁵ "State and Urban Districts Snapshots." National Center for Education Statistics. Retrieved March 19, 2026. <https://nces.ed.gov/nationsreportcard/snapshots/>.

⁵⁰⁶ Ibid.

FIGURE 163: PERCENT OF STUDENTS IDENTIFIED AS PROFICIENT OR ABOVE ON EIGHTH GRADE MATHEMATICS NAEP, 2015-2024

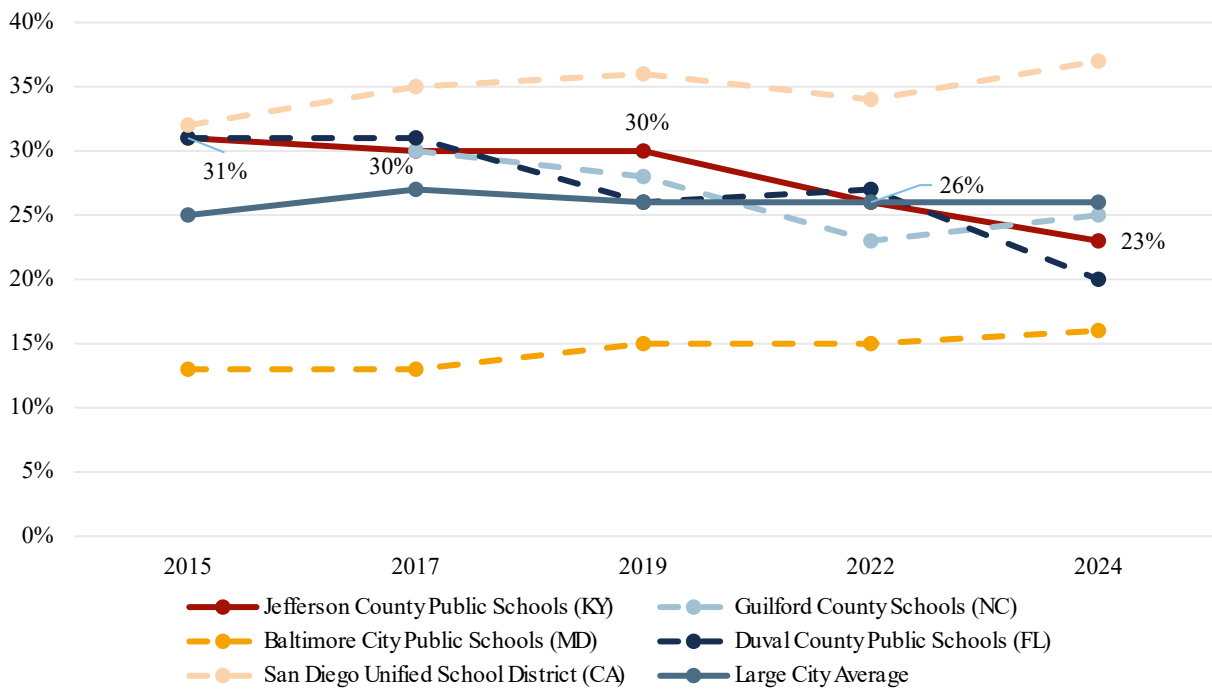


Source: Nation's Report Card website.

Figure 164 shows eighth-grade Reading proficiency rates for JCPs and its peer districts over time. From 2015 to 2019, JCPs's performance was relatively stable, generally matching some peer districts and slightly outperforming most peer districts in 2019. JCPs also achieved higher proficiency rates than the Large City Average from 2015 to 2019. While most districts demonstrated lower average proficiency rates following the COVID-19 pandemic, JCPs is again one of only two districts that has continued to decline in eighth-grade Reading proficiency since 2019. By 2024, JCPs ranks third-lowest among the peer districts. The gap between Kentucky and JCPs proficiency rates has widened between 2019 and 2024; moving from three to six percentage points over this time period.⁵⁰⁷

⁵⁰⁷ "State and Urban Districts Snapshots." National Center for Education Statistics. Retrieved March 19, 2026. <https://nces.ed.gov/nationsreportcard/snapshots/>

FIGURE 164: PERCENT OF STUDENTS IDENTIFIED AS PROFICIENT OR ABOVE ON EIGHTH GRADE READING, NAEP, 2015-2024



Source: Nation's Report Card website.

NAEP data for a TUDA-participating district provide a stable, nationally comparable source of information on student achievement trends and relative performance among peer urban districts. These data may be used to complement state and local assessment results and support district-level discussions related to instructional alignment and system conditions affecting student outcomes. While NAEP results are available to the District, it was not evident to the exam team how TUDA data are currently incorporated into District planning or continuous improvement processes. Further clarification or documentation of how NAEP data inform District-level decision-making would strengthen the coherence and transparency of the District's use of assessment data.

Recommendation	
10.1.a	JCPS should use its new strategic plan to prioritize targeted supports in the grade levels and subject areas with the most sustained post-pandemic declines, with particular emphasis on strengthening core instruction, targeting intervention for below-proficient students, and providing professional learning/coaching to support teachers' delivery of differentiated interventions. An intentional districtwide strategy will ensure that time, staffing, and instructional resources are aligned to the areas of greatest need.

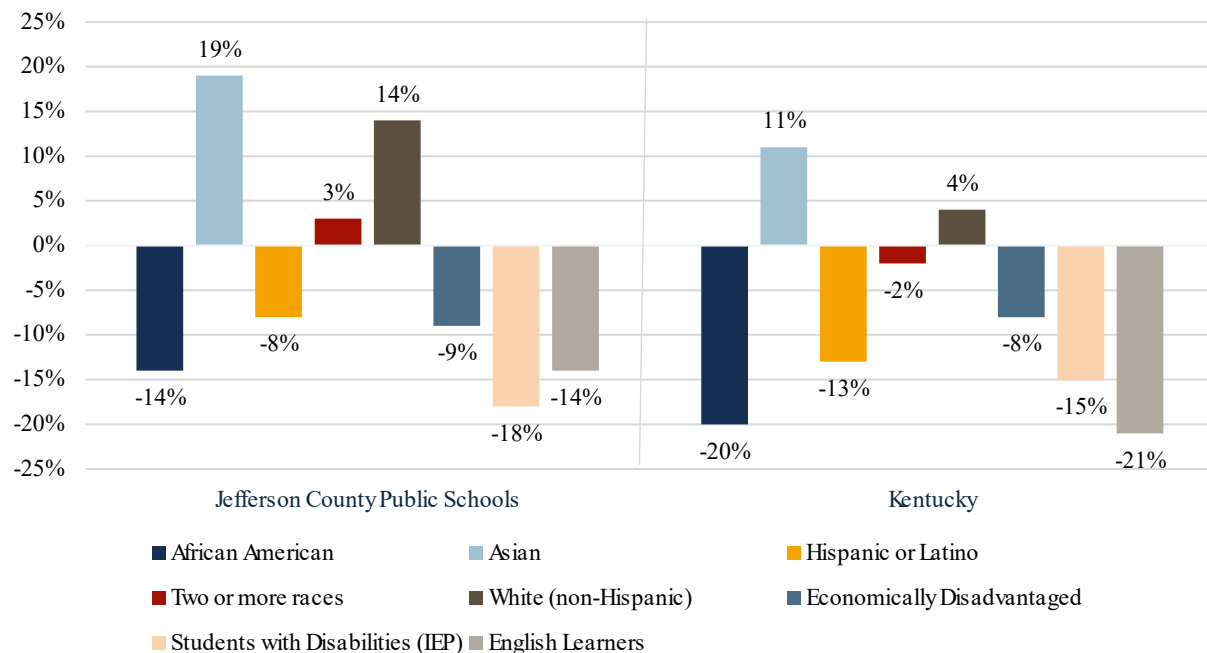
Kentucky Summative Assessments (KSA) Results

Finding	
10.2	Kentucky Summative Assessment results indicate that significant gaps remain across multiple student groups within JCPS. While some JCPS subgroups perform closer to the District average than to the statewide average, the data demonstrate that achievement gaps persist and require JCPS's continued attention.

Figure 165 compares third-grade Reading KSA performance for student subgroups against the JCPS average and the Kentucky average respectively. In general, most subgroups are closer to (or perform better relative to) the JCPS average than they do relative to the statewide average.

- For example, African American students' proficient or distinguished rate is 14 percentage points below the JCPS average, compared to 20 percentage points below the state average. This suggests that, while achievement gaps remain, African American students' performance is closer to the overall average within JCPS than it is statewide.
- In contrast, the two subgroups that perform worse within JCPS compared to Kentucky are economically disadvantaged students and students with disabilities, whose results fall further below the JCPS average than they do below the Kentucky average.

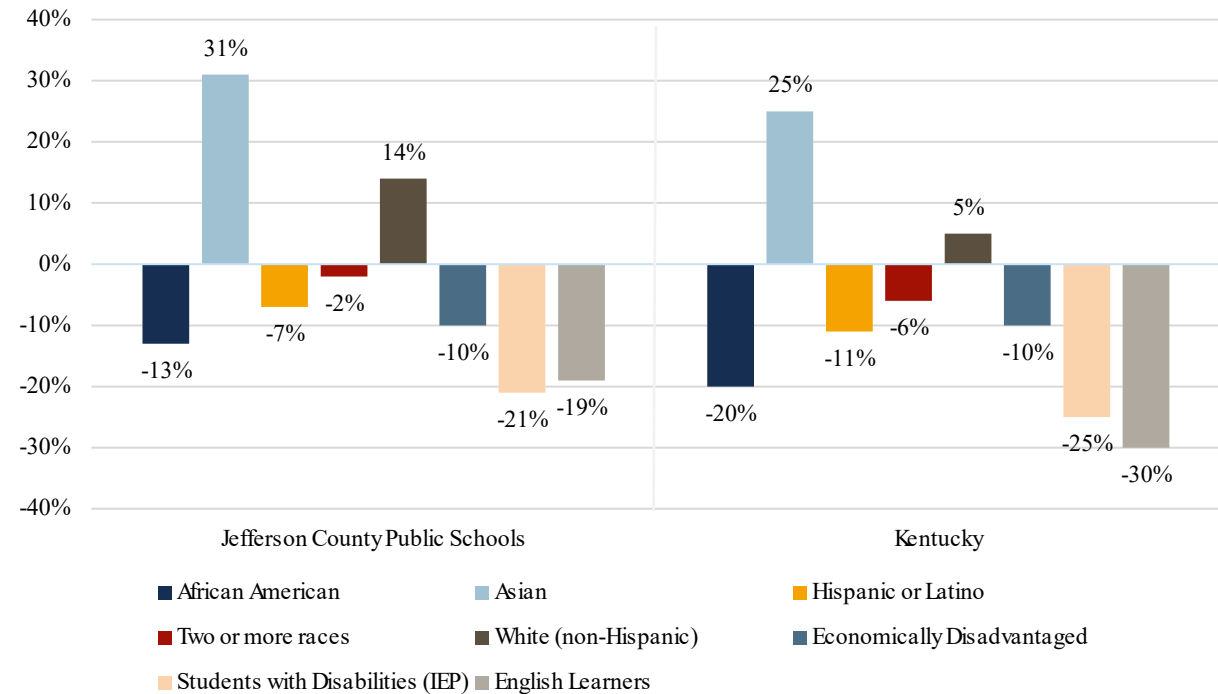
FIGURE 165: PERCENTAGE OF STUDENTS IDENTIFIED AS PROFICIENT OR DISTINGUISHED COMPARED TO THE AVERAGE, THIRD GRADE READING KSA, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Figure 166 compares eighth grade Mathematics KSA performance for student subgroups against the JCPS average and the Kentucky average. Overall, each JCPS subgroup performs as well or better relative to the JCPS average than that same subgroup performs relative to the statewide average. In particular, multilingual learners (MLs) perform notably better within JCPS compared to the JCPS average than MLs statewide do relative to the Kentucky average.

FIGURE 166: PERCENTAGE OF STUDENTS IDENTIFIED AS PROFICIENT OR DISTINGUISHED COMPARED TO THE AVERAGE, EIGHTH GRADE MATHEMATICS KSA, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Figure 165 and Figure 166 demonstrate that significant achievement gaps persist across multiple student groups in both JCPS and Kentucky overall. While several subgroups perform closer to the District average than to the statewide average, suggesting areas of relative strength for JCPS, the results also show that gaps remain substantial and require JCPS’s sustained attention. Examining subgroup performance trends on the KSA is an important tool for Districtwide goal setting because it can help JCPS identify which student groups are furthest from proficiency, monitor whether gaps are narrowing over time, and prioritize strategies and supports where they are most needed.

Student subgroup performance on the KSAs is discussed in more detail in **Chapter 11: Diversity, Equity, and Poverty**.

Recommendation	
10.2.a	JCPS should use Kentucky Summative Assessment results to set clear, measurable subgroup targets for proficiency within the next iteration of its strategic plan.

SCHOOL ACCOUNTABILITY

Overview

Federal law requires states to create an accountability system that identifies the lowest performing schools in need of support and improvement. Kentucky Revised Statute (KRS) 158.6455 outlines the parameters of the Kentucky Accountability System, which consists of six indicators used to measure school performance:

- KSA results in Reading and Mathematics
- KSA results in Science, Social Studies, and Writing
- English learner progress
- Quality of school climate and safety

- Postsecondary readiness
- Graduation rate⁵⁰⁸

Kentucky uses a color-coded system to communicate overall school, district, and state ratings. There are five ratings from highest to lowest — Blue, Green, Yellow, Orange, and Red.⁵⁰⁹ Overall scores are used to determine the lowest performing schools, including those under three federally-defined classifications — Comprehensive Support and Improvement (CSI), Targeted Support and Improvement (TSI), and Additional Targeted Support and Improvement (ATSI).⁵¹⁰ In addition, Kentucky identifies More Rigorous Intervention (MRI) schools statewide.⁵¹¹

FIGURE 167: FEDERAL SCHOOL ACCOUNTABILITY CLASSIFICATIONS

CLASSIFICATION	Description
Comprehensive Support and Improvement (CSI)	Bottom five percent of Title I schools.
Targeted Support and Improvement (TSI)	A school with one or more of the same subgroups performing as poorly as all students in any of the lowest performing 5% of in its level for three consecutive years.
Additional Targeted Support and Improvement (ATSI)	A school that was identified for TSI and has one or more subgroups performing as poorly as all students in the lowest performing 5% of schools in its level.
More Rigorous Intervention (MRI)	A CSI school that does not make improvement for two years or does not exit status after three years.

Source: Jefferson County Public Schools Fall 2025 TSI and ATSI Entrance and Exit Criteria.

Overall School Performance Ratings

Findings	
10.3	According to the 2024-25 Kentucky Accountability System, approximately two-thirds of all JCPS schools receive an overall rating of “red” or “orange” — the two lowest of five performance levels.
10.4	JCPS received an “orange” overall performance rating for its elementary, middle, and high schools and is among only 4% of districts in Kentucky with this rating.

Figure 168 shows the number of schools within each indicator rating for the 2024-25 school year.

- Approximately two-thirds of all JCPS schools were rated “red” or “orange” according to the Kentucky Accountability System.
- 68% of elementary schools as well as 62% of middle and high schools in the District received a “red” or “orange” indicator rating.
- The highest share of “red”-rated schools is at the high school level, while the highest share of “orange”-rated schools is at the elementary level.

⁵⁰⁸ “[KDE Assessment and Accountability: Accountability](#).” Kentucky Department of Education. Published January 26, 2026. Retrieved March 6, 2026. <https://www.education.ky.gov/AA/Acct/Pages/default.aspx>

⁵⁰⁹ Ibid.

⁵¹⁰ “[Federal and State Accountability Requirements](#).” Kentucky Department of Education. Published June 2023. Retrieved March 5, 2026. https://www.education.ky.gov/AA/Acct/Documents/Federal_and_State_Accountability.pdf

⁵¹¹ “[KDE School Improvement: Diagnostic Reviews](#).” Kentucky Department of Education. Published February 5, 2026. Retrieved March 20, 2026. <https://www.education.ky.gov/school/prischedrecov/Pages/Leadership-Assessments.aspx>

FIGURE 168: COUNT OF SCHOOLS BY OVERALL INDICATOR RATING, 2024-25 SCHOOL YEAR

OVERALL INDICATOR RATING	Count of Schools	Percentage of Schools
Elementary School		
Red	27	30%
Orange	34	38%
Yellow	16	18%
Green	9	10%
Blue	3	3%
Middle School		
Red	7	27%
Orange	9	35%
Yellow	5	19%
Green	3	12%
Blue	2	8%
High School		
Red	7	33%
Orange	6	29%
Yellow	4	19%
Green	1	5%
Blue	3	14%
Overall		
Red	41	30%
Orange	49	36%
Yellow	25	18%
Green	13	10%
Blue	8	6%

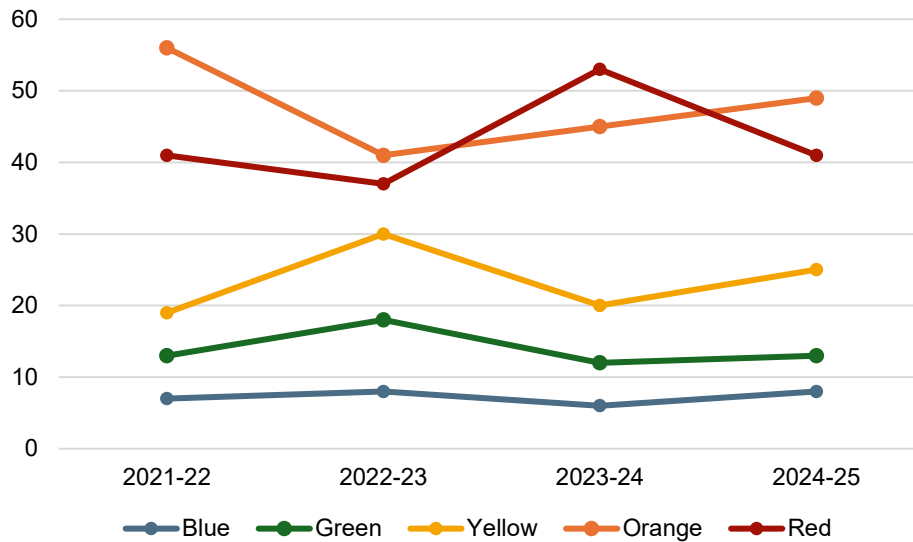
Source: Jefferson County Board of Education Meeting, December 9th, 2025.

Note: Percentages may not add to 100% due to rounding.

Figure 169 shows how JCPS overall school indicator ratings shifted from the 2021-22 to 2024-25 school years. Across this period, the most notable change occurs in the 2023-24 school year, when JCPS experienced a substantial increase in the number of schools receiving a “red” rating. In the 2024-25 school year, the share of “red”-rated schools declined, indicating improvement from the prior year’s peak; however,

the reduction only returned JCPS to approximately its earlier baseline levels observed in the 2021-22 and 2022-23 school years, rather than representing sustained improvement beyond pre-2023-24 performance. Notably, the 2022-23 school year represents the low point for both “red” and “orange” ratings over the years shown.

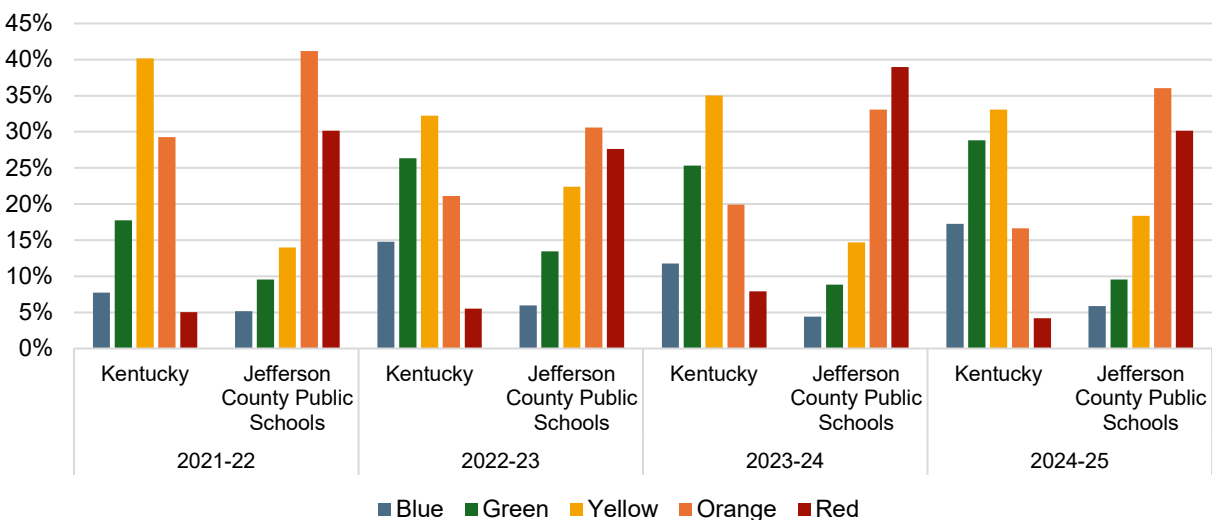
FIGURE 169: JEFFERSON COUNTY PUBLIC SCHOOLS SCHOOL INDICATOR RATINGS COUNT, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Historical SRC Datasets – Accountability website.

Figure 170 shows the distribution of overall school indicator ratings for both JCPS and Kentucky. Compared to schools statewide, JCPS has had a consistently higher share of schools rated “orange” and “red” each year from the 2021-22 through 2024-25 school years. In the 2024-25 school year, 77% of schools in the Commonwealth with a “red” indicator rating are within JCPS, and 23% of schools with an “orange” indicator rating are within JCPS.

FIGURE 170: KENTUCKY AND JEFFERSON COUNTY PUBLIC SCHOOLS SCHOOL INDICATOR RATING PERCENTAGES, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Historical SRC Datasets – Accountability website.

Figure 171 illustrates the statewide overall performance rating, along with results for JCPS and selected peer districts in Kentucky. This comparison shows JCPS underperforming relative to both the statewide average and peer districts, suggesting that JCPS's school-level outcomes lag behind its peer districts. JCPS receives "orange" ratings, the second lowest of five, for its elementary, middle, and high schools. Only three other districts received an "orange" across all three ratings for elementary, middle, and high school; one additional district received a "red" rating across all three levels, and two others received a combination of "orange" and "red" ratings. JCPS, and these other six districts, represents approximately 4% of all Kentucky districts. The three comparison districts listed below perform better than JCPS at all levels.

FIGURE 171: COMPARISON OF OVERALL INDICATOR RATINGS, 2024-25 SCHOOL YEAR

	Kentucky (Statewide)	Jefferson County Public Schools	Boone County Schools	Fayette County Public Schools	Hardin County Schools
Elementary School	Yellow	Orange	Green	Yellow	Yellow
Middle School	Yellow	Orange	Green	Green	Yellow
High School	Yellow	Orange	Yellow	Yellow	Green

Source: Kentucky Department of Education Report Card Dashboard.

Recommendations	
10.3.a	JCPS should assess its current suite of differentiated supports for schools rated "red" and "orange" with a clear focus on accelerating improvement in the lowest-performing schools.
10.4.a	JCPS should establish districtwide, multi-year goals aligned to the Kentucky Accountability System in its new strategic plan to ensure progress on state-measured outcomes.

Identification of Federally-Designated Schools

Finding	
10.5	JCPS has a large number of schools with federal designations, demonstrating significant underperformance year after year. In the 2024-25 school year, JCPS saw an increase in the number of schools demonstrating persistent and/or school-wide underperformance (ATSI and CSI).

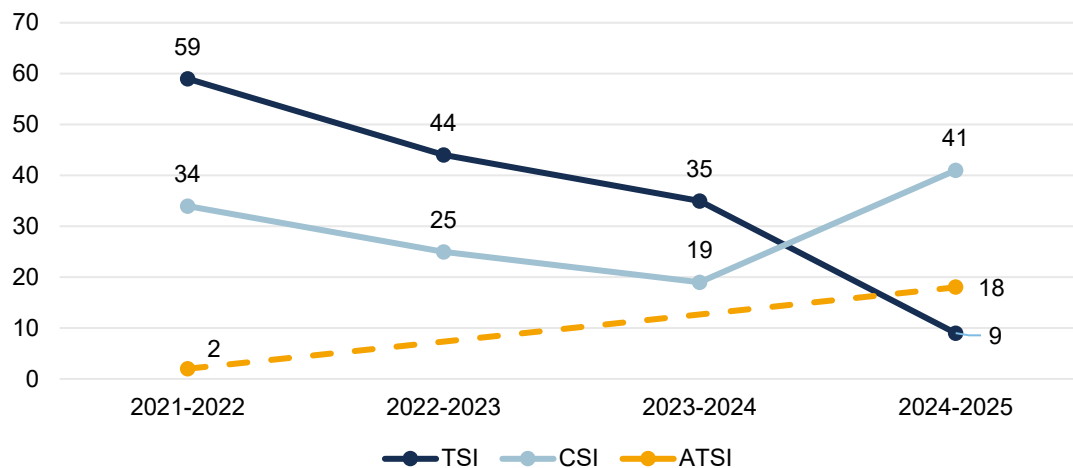
Figure 172 below demonstrates the number of JCPS schools identified as CSI, TSI, and ATSI schools from 2021 to 2025.

- CSI Schools:** The number of identified CSI schools in JCPS declined steadily but increased by 22 schools in the 2024-25 school year because this was the first time in three years that schools were identified for CSI. The total number of JCPS CSI schools in the 2024-25 school year (41) represents an increase of seven schools from the last year that schools were identified as CSI (2021-22 school

year). One JCPS school exited CSI status in the 2024-25 school year.⁵¹² JCPS schools represent 77% of all schools identified as CSI statewide in 2025.⁵¹³

- **TSI Schools:** The number of identified TSI schools in JCPS significantly decreased since 2021, marked by a steep 26-school decline from the 2023-24 to 2024-25 school year. However, this is largely attributed to TSI schools moving to ATSI and CSI status. Thirty-one schools transitioned from TSI in the 2023-24 school year to CSI or ATSI in the 2024-25 school year. For these schools, their underperformance has persisted and/or expanded beyond the initial student subgroup identified for improvement under TSI.
- **ATSI Schools:** ATSI schools are identified every three years in Kentucky from the group of schools that were identified as TSI in the immediately preceding year.⁵¹⁴ ATSI schools were most recently identified in the 2024-2025 school year, and 18 JCPS schools were identified as ATSI. This increase in ATSI schools helps to explain the significant drop in TSI schools in the 2024-25 school year described above. No new schools were identified as ATSI in the three years prior (2021-22 school year) given the COVID-19 pandemic.

FIGURE 172: JEFFERSON COUNTY PUBLIC SCHOOLS FEDERAL SCHOOL IMPROVEMENT DESIGNATIONS COUNT, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Historical SRC Datasets – Accountability website.

Note: ATSI schools are identified every three years from the schools that were identified as TSI in the immediately preceding year. Thus, data is not available for the 2022-23 and 2023-24 school years and is not presented in the figure.

Recommendation

10.5.a

JCPS should evaluate its current differentiated supports for CSI, TSI, and ATSI schools. In particular, JCPS should assess the effectiveness of supports for TSI schools to prevent those schools from escalating to CSI or ATSI identification.

⁵¹² [Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view). Jefferson County Public Schools. Retrieved February 24, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view>

⁵¹³ Ragusa, Joe. “[KDE Releases 2024-2025 Assessment and Accountability Data](https://www.kentuckyteacher.org/news/2025/11/kde-releases-2024-2025-assessment-and-accountability-data/).” Kentucky Teacher. Published November 19, 2025. Retrieved March 6, 2026. <https://www.kentuckyteacher.org/news/2025/11/kde-releases-2024-2025-assessment-and-accountability-data/>

⁵¹⁴ “[KDE School Improvement: Targeted Support and Improvement](https://www.education.ky.gov/school/focschls/Pages/default.aspx).” Kentucky Department of Education. Published February 25, 2026. Retrieved March 6, 2026. <https://www.education.ky.gov/school/focschls/Pages/default.aspx>

PROGRESS MONITORING AND SYSTEMS IMPROVEMENT

Comprehensive District Improvement Plan (CDIP)

703 KAR 5:225 requires all school districts in Kentucky to develop and annually update a Comprehensive District Improvement Plan (CDIP).⁵¹⁵ As part of the development process, districts review student performance data, solicit input from key stakeholders, and identify goals, strategies and activities intended to improve student achievement and reduce achievement gaps among student groups. KDE provides a required template to support consistent reporting across the state.⁵¹⁶

The exam team reviewed JCPS’s CDIPs for school years 2022–23 through 2025–26. Across this four-year period, JCPS consistently addressed KDE’s required goal areas and aligned its plan to Kentucky’s six accountability indicators. Over time, JCPS also increased its use of interim measures (e.g., MAP and CERT results) to monitor progress throughout the year, while continuing to anchor long-term goals in KSA proficiency and accountability outcomes (particularly in the 2024–25 and 2025–26 CDIPs).

As noted in **Chapter 1: District Leadership & Strategy**, the 2025–26 CDIP indicates the District is transitioning away from Goals and Guardrails. The exam team hopes that JCPS sets an updated strategy for student achievement ahead of the launch of the 2026–27 CDIP.

Progress Monitoring Processes

Finding	
10.6	JCPS’s school improvement model is unnecessarily complex, and it is unclear to the exam team how it works in practice to improve schools.

ARSI, in coordination with the Schools, DEP, and Academics Divisions, is responsible for creating and executing system-level strategies that support schools engaged in improvement and progress monitoring. Specifically, this body of work is led by the Executive Administrator of Research and Systems Improvement, with support from ARSI staff focused on supporting systems improvement. ARSI describes its work primarily as a liaison between the District and KDE to support improvement planning through research, aid in strategic planning, and provide feedback to help schools achieve their vision for every student. The District’s improvement model integrates federal and state accountability requirements through the Comprehensive School Improvement Plan (CSIP).⁵¹⁷

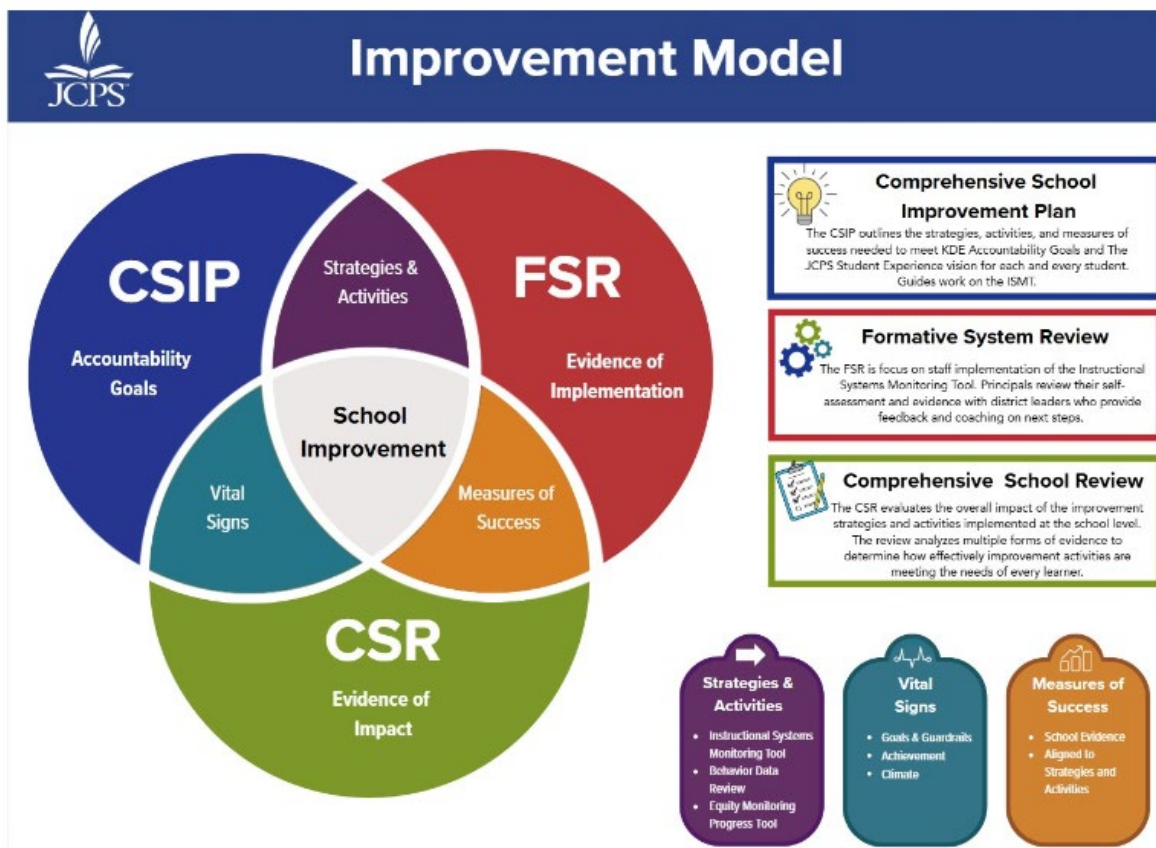
The District developed the “JCPS Systems Improvement Model” to support school and District improvement planning cycles:

⁵¹⁵ “Comprehensive Improvement Planning for Schools and Districts.” Kentucky Department of Education. Published September 29, 2025. Retrieved March 6, 2026. <https://www.education.ky.gov/school/csip/Pages/default.aspx>

⁵¹⁶ [Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](#). Jefferson County Public Schools. Retrieved February 24, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view>

⁵¹⁷ “JCPS ARSI Website: Systems Improvement and Planning.” Jefferson County Public Schools. Retrieved March 18, 2026. <https://sites.google.com/jefferson.kyschools.us/research/improvement-planning>

FIGURE 173: JEFFERSON COUNTY PUBLIC SCHOOLS SYSTEMS IMPROVEMENT MODEL



Source: Jefferson County Public Schools ARSI Systems Improvement and Planning website.

Figure 174 summarizes JCPS's self-reported progress-monitoring activities that help schools and leaders collect and analyze interim data and use those results to adjust classroom, school, and instructional practices. The Central Office, specifically Schools, Academics, DEP, ARSI, and the Office of the Chief of Staff, play a role in the progress monitoring processes described in Figure 174. All of these processes involve gathering and reflecting on data in some way. Despite the graphic showed in Figure 173, it is not clear to the exam team how these pieces work together in practice. It also appears that some processes have duplicative purposes and create unnecessary reporting requirements for District and school administrators.

FIGURE 174: JEFFERSON COUNTY PUBLIC SCHOOLS PROGRESS MONITORING PROCESSES

NAME	Description
Formative Systems Reviews (FSR)	District and school administrators analyze data from biannual strategic plan initiatives to identify strengths and areas for improvement and provide feedback to strengthen alignment to the strategic plan.
Vital Signs	ARSI generates Vital Signs reports every six weeks to monitor Key Performance Indicators (KPI) and identify where District leadership may need to provide additional support to improve outcomes. KPIs are aligned to academics and climate and culture. School leaders receive school-level Vital Signs reports, and Assistant Superintendents in the Schools Division receive school-level and Zone-level reports.
Comprehensive System Reviews (CSR)	ARSI conduct an independent, research-based review of a school's systems and their impact on student outcomes. Twenty-five schools are selected annually, with the goal of reviewing all schools on a three-year cycle. Central Office staff reported that principal tenure, CSI/TSI designation, Title I status, and assigned Schools Division zone are factored considered for selecting schools. Reviews inform a Districtwide picture of needs and trends to guide future improvement planning.
Academic and School Division Meetings	Academics and Schools Divisions within the Central Office review current strengths and challenges identified across schools and provide feedback on strategic plan implementation strategies. Meetings include the District's Assistant Superintendents from Academics and Schools Divisions. School principals do not participate in these meetings.
Principal Professional Learning Communities (PPLCs)	Spaces for principals to discuss challenges and successes identified by principals and share strategies for improvement. PPLCs are led by the Assistant Superintendents for each school zone.
Racial Equity Monitoring Tools	Tools produced and managed by the DEP Division to apply a racial equity lens to school and District improvement work using tools such as the Racial Equity Analysis Protocol (REAP), Equity Monitoring Progress Tool (EMPT), and Affirming Racial Equity (ARE). These tools are described further in Chapter 10: Diversity, Equity, and Poverty.
District Improvement Goals	New in 2025-26, ARSI produces monthly reports on school progress toward District goals, including improving reading and math achievement and reducing chronic absenteeism and discipline incidents. Reports also highlight school leadership strategies to strengthen student behavior and attendance practices.

Source: Jefferson County Public Schools 2025-26 Comprehensive District Improvement Plan.

In interviews and focus groups, Central Office staff noted these disparate tools and reporting requirements as a pain point. In an effort to fix this, the District recently launched a tool in Google Sheets to streamline

the data entry and goal setting process. The tool is called the Instructional Systems Monitoring Tool (ISMT) and it is a first attempt at centralizing data entry and goal setting. Currently, this includes school-level goals related to Literacy, Mathematics, and Journey to Success. Data from the ISMT is populated directly into their CSIP, which is a state-required plan to support continuous improvement. The ISMT is also used for data entry for the FSR process. Schools also use the ISMT to input evidence associated with their progress monitoring. The ISMT was described by staff as a positive step towards streamlining school reporting and monitoring requirements, but they also noted that there were still separate school-level reporting requirements outside of the ISMT. Three specific examples of reports not included in the ISMT currently include the Racial Equity Plan, Attendance Plan, and Behavior Data Review.

In interviews, Central Office staff described JCPS as a “data-rich” District. They pointed to the processes in Figure 174, including the FSR, Vital Signs, and CSR as examples of data they have available to support decision-making. However, staff also identified challenges related to data literacy among school-level staff, access to relevant data, and the extent to which data was being used strategically to guide decision-making.

In the 2024-25 school year, JCPS underwent a KDE-initiated Diagnostic Review. The review, completed by Cognia, evaluated the District’s progress against a set of performance standards. The final report noted that JCPS lacked Districtwide “monitoring processes to ensure new and existing initiatives are implemented with fidelity and evaluated for effectiveness.”⁵¹⁸ Cognia noted the District did not evaluate or assess whether progress monitoring processes were consistently implemented as intended.⁵¹⁹ This suggests that, although JCPS collects and reviews data on an ongoing basis, it has not yet established a cohesive improvement system that translates those processes into meaningful school-level progress.

Recommendation	
10.6.a	JCPS should streamline its school improvement model and clearly articulate how its components are intended to function together in practice to support and accelerate school improvement.

JCPS Model for Supporting Underperforming Schools

Overview

Observations	
10.7	The Enhanced Support Zone model does not work as intended, given the number of schools that continue to be federally identified as CSI.
10.8	JCPS’s supports and requirements for CSI schools do not appear to be clearly defined or well-aligned, and they lack an overarching strategy.

Each JCPS school is assigned to a “zone” within the Schools Division that is led by an assistant superintendent. Schools identified as MRI are in the Enhanced Support Zone (ESZ). This zone also includes Choice Zone schools, which are 13 schools that have been historically under-resourced in West Louisville.⁵²⁰ There are some schools in the ESZ that are identified as both MRI and Choice Zone schools, and a total of 24 schools are part of this zone. All 24 schools are identified as CSI. This zone is a comparable size to the other zones.

Other CSI, TSI, and ATSI schools are part of JCPS’s elementary, middle, and high school zones. School division staff described a “tiering” process that uses data (including federal designations) to determine the

⁵¹⁸ “Cognia Diagnostic Review Report: Results for Jefferson County Public Schools.” Cognia. Retrieved March 4, 2026. <https://www.education.ky.gov/school/prischedrecov/Documents/2024-2025%20Jefferson%20County%20Public%20Schools%20Diagnostic%20Review.pdf>

⁵¹⁹ Ibid.

⁵²⁰ “School Choice Proposal.” Jefferson County Public Schools. Retrieved March 26, 2026. <https://www.jefferson.kyschools.us/page/school-choice-proposal>

level of support each school needs. Schools that identified as needing more support receive more frequent visits and coaching conversations with their principal supervisors. All CSI schools also receive a dedicated coach from KDE to support their turnaround efforts.

The District described the ESZ as one that provides support to the District's lowest performing schools through targeted supports and continuous improvement processes.⁵²¹ Established in the 2025-26 school year, the ESZ was designed to offer more dedicated supports to MRI schools specifically. Previously, JCPS operated an Accelerated Improvement Schools (AIS) zone that included all schools identified as CSI, rather than a subset. Central Office staff shared that the AIS zone in the 2024-25 school year included 33 schools and was staffed at the same level as the newly formed ESZ, and that the change enabled principal supervisors to support a smaller number of schools. The transition from AIS to ESZ does not appear to have substantially changed the Central Office support model for these schools.

In the current organizational structure, an assistant superintendent, with three executive administrator direct reports, leads the ESZ. These four individuals split the portfolio of schools and directly supervise a subset of principals. These four "principal supervisors" in the ESZ have a smaller portfolio of schools to support compared to the other zones, which allows them to provide more direct support to schools. Relatedly, within the Academics Division, three MRI Support roles each support a specific school level — elementary, middle, and high school MRI schools. Academics division staff also noted that they prioritize supporting MRI schools when considering how to allocate their time to schools.

The new organizational structure, set to go into effect on July 1, 2026, includes a similar reporting structure under the Chief Academic Officer. It includes a regional assistant superintendent for the ESZ, with three principal supervisors reporting to them. There are also two additional academic directors that report to the regional assistant superintendent and have direct reports that include instructional leads and regional academics coaches. The academic directors, and the positions under them, will add 20 instructional support roles to the ESZ. It can be reasonably inferred that these positions will support the academics and instruction of schools in this zone. These supports will likely be similar to those currently being provided by the existing Academics Division. It is unclear to the exam team exactly how much additional capacity will be allocated to the ESZ as a result of the reorganization.

The Enhanced Support Zone's Supports

Schools in the ESZ have multiple meetings, training, and reporting requirements and receive coaching and support through the zone. The 24 ESZ schools receive weekly visits from their principal supervisor. Each ESZ school is required to develop a turnaround plan that identifies improvement priorities and includes 30, 60, and 90-day action plans. ESZ staff described these plans as guiding documents for coaching principals and school-based staff. ESZ staff also reported leading a weekly meeting for principals identified as needing intensive support and for principals who are new to their roles; participants discuss how to measure their work and ensure it aligns with school improvement. In addition, ESZ staff facilitate a collaborative group for assistant principals in the zone. Schools in the ESZ also receive supplemental, differentiated support from the Central Office. In interviews with the exam team, Central Office staff noted that these supports include improvement science training, support to execute 30, 60, and 90-day plans, and assistance from turnaround teams. Principals and assistant principals participate in improvement science training through the Carnegie Foundation for the Advancement of Teaching.

Progress monitoring and reviewing data was also noted by staff as a component of the additional support provided to ESZ schools. Central Office staff described a biweekly meeting between the Chief of Schools and the Chief Academic Officer to discuss persistently underperforming schools. Under the direction of Dr.

⁵²¹ [Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view). Jefferson County Public Schools. Retrieved February 24, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view>

Yearwood, MRI school principals have been invited to present their school’s data to the Cabinet, including what is working, where improvements are needed, and how the Cabinet can offer stronger support.

As mentioned previously, each CSI school is supported by a dedicated KDE coach. It was not clear to the exam team what steps, if any, the ESZ was taking to ensure alignment and consistency across these supports. Principals shared that ESZ principals are required to attend additional meetings and training, as well as complete additional reporting requirements. They described these additional requirements as ones that take them away from visiting classrooms and supporting teachers, rather than being useful inputs for their school’s improvement.

While the exam team views the additional Central Office capacity dedicated to MRI and Choice Zone schools under the ESZ model as positive, JCPS should ensure that this added capacity is grounded in a clear, coherent support model that aligns with both JCPS and KDE requirements. In its current state, the support model did not appear to be clear or coherent to the exam team; it lacks an overarching strategy.

The Schools Division is discussed in more detail in **Chapter 9: Curriculum & Instruction**.

Recommendations	
10.7.a	JCPS should evaluate the effectiveness of its Enhanced Support Zone (ESZ) support model for More Rigorous Intervention Schools (MRI) schools, including whether the model provides sufficient differentiated supports. Based on the evaluation findings, JCPS should refine the model and resource allocation to ensure supports are targeted, non-duplicative, and matched to school needs.
10.8.a	JCPS should examine the totality of requirements for federally designated schools and ensure they are not requiring redundant or unnecessary time commitments of these schools.

CHAPTER 11: DIVERSITY, EQUITY, AND POVERTY

OVERVIEW

This chapter outlines practices, programs, and initiatives related to Diversity, Equity, and Poverty within JCPS. The Diversity, Equity, and Poverty (DEP) Division is the Central Office team responsible for stewarding these efforts. As of February 2026, JCPS plans to rename the division to the Opportunity & Access Division as part of its broader Central Office reorganization.

COMPLIANCE WITH CURRENT FEDERAL GUIDELINES

Finding	
11.1	It is necessary for JCPS to monitor federal guidance to ensure ongoing compliance.

On February 14, 2025, the United States Department of Education (ED) released a “Dear Colleague” letter instructing schools to end their Diversity, Equity, and Inclusion (DEI) practices or face funding cuts.⁵²² By April 2025, ED required states to collect signatures from school systems certifying their compliance with civil rights laws, warning that continued DEI initiatives could result in termination of federal grants and contracts.⁵²³ In August 2025, a Maryland judge invalidated the guidance and certification requirement.⁵²⁴ ED initially appealed, but then subsequently abandoned its appeal in January 2026.⁵²⁵ Other lawsuits remain pending.⁵²⁶ Federal courts have stated that ED’s DEI directives are too vague and violate educators’ First Amendment right to free speech.⁵²⁷ As of February 2026, ED has said that it will continue to challenge DEI initiatives under the authority of Title VI of the Civil Rights Act, requiring school districts to remain vigilant to ensure that their practices do not put them at risk for federal funding loss.⁵²⁸

JCPS was one of only two districts in Kentucky that did not sign the certification letter.⁵²⁹ Instead, JCPS submitted alternative documentation stating it was in compliance with state and federal regulations, including Title VI and Civil Rights laws.⁵³⁰ Former JCPS Superintendent Dr. Marty Pollio sent a letter to ED

⁵²² Raymond, Nate. “[US judges lock Trump’s Ability to Withhold School Funds Over DEI](https://www.reuters.com/legal/us-judge-limits-trumps-ability-withhold-school-funds-over-dei-2025-04-24/).” Reuters. Published April 24, 2025. Retrieved August 25, 2025. <https://www.reuters.com/legal/us-judge-limits-trumps-ability-withhold-school-funds-over-dei-2025-04-24/>

⁵²³ Ibid.

⁵²⁴ Shivers, Nonnie; Zaggar, Zachary; Deakins; Ogletree, Deakins, Nash, Smoak & Stewart, P.C. “[Maryland Federal District Court Blocks Education Department’s Moves Against DEI Programs](https://natlawreview.com/article/maryland-federal-district-court-blocks-education-departments-moves-against-dei).” The National Law Review. Published August 19, 2025. Retrieved January 6, 2026. <https://natlawreview.com/article/maryland-federal-district-court-blocks-education-departments-moves-against-dei>

⁵²⁵ Jacobson, Linda. “[Education Dept. Drops Appeals in Case Challenging Anti-DEI Letter](https://www.the74million.org/article/education-dept-drops-appeal-in-case-challenging-anti-dei-letter/).” The 74 Million. Published January 21, 2026. Retrieved February 20, 2026. <https://www.the74million.org/article/education-dept-drops-appeal-in-case-challenging-anti-dei-letter/>

⁵²⁶ “[Higher Education Litigation and Federal Policy: 2025 Year in Review](https://foleyhoag.com/news-and-insights/publications/alerts-and-updates/2026/january/higher-education-litigation-and-federal-policy-2025-year-in-review/).” Foley Hoag. Published January 5, 2026. Retrieved January 6, 2025. <https://foleyhoag.com/news-and-insights/publications/alerts-and-updates/2026/january/higher-education-litigation-and-federal-policy-2025-year-in-review/>

⁵²⁷ Raymond, Nate. “[US Judges Block Trump’s Ability to Withhold School Funds Over DEI](https://www.reuters.com/legal/us-judge-limits-trumps-ability-withhold-school-funds-over-dei-2025-04-24/).” Reuters. Published April 24, 2025. Retrieved January 6, 2025. <https://www.reuters.com/legal/us-judge-limits-trumps-ability-withhold-school-funds-over-dei-2025-04-24/>

⁵²⁸ Modan, Naaz. “[Education Department Doubles Down on Anti-DEI Efforts](https://www.k12dive.com/news/education-department-doubles-down-on-anti-dei-efforts/811276/).” K-12 Dive. Published February 4, 2026. Retrieved February 20, 2026. <https://www.k12dive.com/news/education-department-doubles-down-on-anti-dei-efforts/811276/>

⁵²⁹ “[JCPS Does Not Sign Letter from US Department of Education Concerning DEI Initiatives](https://www.wdrb.com/news/education/jcps-does-not-sign-letter-from-us-department-of-education-concerning-dei-initiatives/article_9895b129-961a-4fb1-b693-dbd86972b5db.html).” WDRB. Published May 8, 2025. Retrieved August 26, 2025. https://www.wdrb.com/news/education/jcps-does-not-sign-letter-from-us-department-of-education-concerning-dei-initiatives/article_9895b129-961a-4fb1-b693-dbd86972b5db.html

⁵³⁰ Horsley, McKenna. “[Nearly All Kentucky Public Schools Sign Compliance Form with Trump’s View on Civil Rights](https://kentucky.lantern.com/news/education/nearly-all-kentucky-public-schools-sign-compliance-form-with-trumps-view-on-civil-rights/).” Kentucky Lantern. Published May 1, 2025. Retrieved August 26, 2025.

acknowledging the policies and assuring that JCPS “complies with and will continue to comply with state and federal law relating to nondiscrimination.”⁵³¹ The letter included 40 pages of supporting documentation detailing, according to JCPS, how it complies with federal law.⁵³² While Dr. Brian Yearwood, the current JCPS Superintendent, has not explicitly commented on these federal guidelines publicly, when asked publicly about DEI, he said, “If you don’t have a diversity lens, if you don’t have equitable practices within your school district, then there will be the haves and the have nots. And that’s not happening.”⁵³³

In October 2025, ED ended a \$9.7 million federal grant in JCPS to support magnet programs due to alleged Civil Rights Act violations.⁵³⁴ The Magnet Schools Assistance Program (MSAP) grant was awarded to JCPS in June 2025 to expand magnet programs in the District. The US Office of Civil Rights (OCR) notified JCPS the following month in July that it had concerns with its practices, specifically the Racial Equity Analysis Protocol (REAP), the District Racial Equity Policy, and the school funding formula. The REAP and District Racial Equity Policy are included in the Appendix. In September 2025, JCPS replied to the OCR stating that the District undertook a comprehensive review of its policies and added language to its non-discrimination and Title VI-related policies.⁵³⁵ The District also explained revisions to its discipline process and funding formula, noting that both were being updated to address OCR’s concerns.⁵³⁶ But JCPS did not satisfy OCR’s concerns, so OCR denied the continuation of the grant.⁵³⁷

In October 2025, as noted in **Chapter 4: Finance**, the Board approved the draft FY2026-27 school allocation standards. These standards outline how funds are distributed to JCPS schools. The Board removed all references to “racial equity” as a goal or component in the school funding formula. Additionally, students of color were eliminated as a factor in the funding allocation model for elementary schools.⁵³⁸

There are currently no state statutes in Kentucky specific to restricting DEI programming or funding in public K-12 schools. In January 2026, the Kentucky Education Equality Protection (KEEP) Act (Senate Bill 26) was introduced in the Senate to prohibit public school districts from expending resources on DEI initiatives, among other things. As of the end of the 2026 legislative session, the bill did not pass. In the 2025 legislative session, a similar bill was introduced, although it did not receive a committee hearing.

Federal guidance continues to evolve, and in this chapter, the exam team provides an assessment of JCPS’s DEI-related initiatives based on our best understanding of federal civil rights law as of February 2026. Federal funding accounted for approximately 13% of JCPS’s funding in the 2024-25 school year.⁵³⁹

<https://kentuckylandern.com/2025/05/01/nearly-all-kentucky-public-schools-sign-compliance-form-with-trumps-view-on-civil-rights/>

⁵³¹ Clark, Jess. “[All But Two KY School Districts Sign Trump Administration’s Pledge Against ‘Illegal’ DEI](https://www.lpm.org/investigate/2025-05-01/all-but-two-ky-school-districts-sign-trump-administrations-pledge-against-illegal-dei).” Louisville Public Media. Published May 1, 2025. Retrieved September 29, 2025. <https://www.lpm.org/investigate/2025-05-01/all-but-two-ky-school-districts-sign-trump-administrations-pledge-against-illegal-dei>

⁵³² Clark, Jess. “[All But Two KY School Districts Sign Trump Administration’s Pledge Against ‘Illegal’ DEI](https://www.lpm.org/investigate/2025-05-01/all-but-two-ky-school-districts-sign-trump-administrations-pledge-against-illegal-dei).” Louisville Public Media. Published May 1, 2025. Retrieved September 29, 2025. <https://www.lpm.org/investigate/2025-05-01/all-but-two-ky-school-districts-sign-trump-administrations-pledge-against-illegal-dei>

⁵³³ Horsley, McKenna. “[Tricky Politics Will Greet Louisville’s First Black School Superintendent](https://kentuckylandern.com/2025/06/10/tricky-politics-will-greet-louisvilles-first-black-school-superintendent/).” Kentucky Lantern. Published June 10, 2025. Retrieved October 15, 2025. <https://kentuckylandern.com/2025/06/10/tricky-politics-will-greet-louisvilles-first-black-school-superintendent/>

⁵³⁴ “[JCPS Losing \\$9.7M Federal Grant for Magnet Programs](https://www.wlky.com/article/jcps-losing-federal-grant-magnet-programs/68410276).” WLKY. Published October 3, 2025. Retrieved December 30, 2025. <https://www.wlky.com/article/jcps-losing-federal-grant-magnet-programs/68410276>

⁵³⁵ Garcia-Franceschini, Fernando. “[An Abuse of Discretion: JCPS Loses Close To \\$10 Million In Federal Grant Aimed at Growing Magnet Programs](https://www.wave3.com/2025/10/03/an-abuse-discretion-jcps-loses-close-10-million-federal-grant-aimed-growing-magnet-programs/).” Wave 3. Published October 3, 2025. Retrieved January 5, 2026. <https://www.wave3.com/2025/10/03/an-abuse-discretion-jcps-loses-close-10-million-federal-grant-aimed-growing-magnet-programs/>

⁵³⁶ Ibid.

⁵³⁷ Ibid.

⁵³⁸ “Jefferson County Board of Education FY 2026-27 School Allocation Standards.” Jefferson County Board of Education. Retrieved February 18, 2026. [PDF].

⁵³⁹ “[Report Card Dashboards: Jefferson County](https://reportcard.kyschools.us/kysrc?organization=20232024:275:275000&sid=009b1e23-33f1-86ce-ac11-3a12a9c336c3&gid=67860f32-fdaf-6a21-06b5-3a12fc211b31).” Kentucky Department of Education. Published May 15, 2025. Retrieved January 8, 2026. <https://reportcard.kyschools.us/kysrc?organization=20232024:275:275000&sid=009b1e23-33f1-86ce-ac11-3a12a9c336c3&gid=67860f32-fdaf-6a21-06b5-3a12fc211b31>

Recommendation

11.1.a

JCPS should monitor the status of the latest federal guidance and update JCPS policies, as needed, in accordance with any changes.

DISTRICT RACIAL EQUITY POLICY

Overview

JCPS's District Racial Equity Policy, adopted by the Board in 2018 and amended October 2025, defines racial educational equity as a "systemic approach to eliminate inequities and improve education opportunities, experiences, and outcomes for all students, that validates and affirms race by examining those historical, social, and institutional factors present in education."⁵⁴⁰ The policy outlines the District's commitment to correcting these inequities and ensuring that all students have improved opportunities, experiences, and outcomes.⁵⁴¹

The Policy assigns specific responsibilities to the Superintendent, Board, Central Office, and schools. The superintendent is instructed to create a system-wide racial educational equity plan ("District Racial Equity Plan"), outlining strategies to advance equity. This plan is updated every three years, with all Central Office divisions contributing their own strategies.

The District Racial Equity Plan must address the following policy directives:

- Diversity in curriculum, instruction, and assessment
- School culture and curriculum
- Programmatic access to enhanced or accelerated educational programs
- Staffing and classroom diversity
- Evaluating board policies and administrative procedures

Specifically, the policy directive addressing diversity in curriculum, instruction, and assessment states:

"The District shall:

- Identify, develop, utilize, and prioritize Districtwide implementation of evidence-based planning and instructional practices, such as those lifted in the Affirming Racial Equity (ARE) Tool, that have been shown to improve learning outcomes for Students of Color at all achievement levels in order to minimize the prevalent and persistent learning outcome gaps among Students of Color and White students.
- Adopt high-quality instructional resources and develop professional learning for school staff in alignment with Kentucky Academic Standards to implement that more effectively and accurately include the contributions and historical relevance of African-American, Latinx, Asian-America, and other non-White cultures; the experiences of People of Color; and the history of immigration, indigenous peoples, and ethnic diasporas, and their impact on U.S. history, culture, and society."⁵⁴²

JCPS's District Racial Equity Policy and Plan, as well as the ARE Tool are included in the **Appendices**.

In parallel, every school is responsible for creating its own Racial Equity Plan (REP) and establishing a Racial Equity Committee (REC). The REP is required to include goals and metrics for improvement that are aligned with the above policy directives. Schools report progress on their goals and action steps four

⁵⁴⁰ "[Jefferson County Board of Education Policy 09.131 District Racial Equity Policy](https://policy.ksba.org/Chapter.aspx?distid=56)." Jefferson County Board of Education Policy Manual. Adopted/Amended October 14, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁵⁴¹ Ibid.

⁵⁴² "[Jefferson County Board of Education Policy 09.131 District Racial Equity Policy](https://policy.ksba.org/Chapter.aspx?distid=56)." Jefferson County Board of Education Policy Manual. Adopted/Amended October 14, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

times during the school year. Progress is tracked using a tool called the Equity Monitoring Progress Tool (EMPT). The EMPT is submitted to the DEP Division each spring for review and feedback.⁵⁴³ More about the EMPT is discussed below in **DEP Tools and Resources** section, and the EMPT is also included in the Appendix.

Finally, the superintendent is required to establish the Advisory Council for Racial Equity (ACRE), and the DEP division is charged with facilitating it. ACRE is composed of teacher, administrator, classified staff, and parent representatives that reflect the racial, ethnic, and linguistic diversity of the student population. ACRE is charged with providing feedback on challenges with racial equity in the District and delivering related technical support to schools and District leadership.⁵⁴⁴ According to public records as of February 2026, ACRE last met in March 2023 and December 2025.⁵⁴⁵ JCPS submitted documentation to the exam team stating that ACRE meets, on average, four to six times per year.⁵⁴⁶

Achievement Gap

Finding	
11.2	JCPS has persistent gaps in student achievement across multiple student subgroups.

KRS 158.649 defines achievement gap as the “difference between performance goals and actual performance [...] for each of the various subgroups of students.” This law requires Kentucky school boards to adopt a policy to review the academic performance for student subgroups, including major racial groups, gender, disability, free and reduced-price school lunch eligibility, and limited English proficiency. It also calls for each school to create an annual comprehensive improvement plan aimed at reducing achievement gaps. Relatedly, the District Racial Equity Policy calls for the superintendent to outline strategies in the District Racial Equity Plan for raising the achievement of these same student subgroups.⁵⁴⁷ The District’s current strategies are included in the current version of their District Racial Equity Plan and are discussed in the **District Racial Equity Plan** section below. The Plan is also included in the Appendix.

Figure 175 shows Kentucky Summative Assessment (KSA) proficiency rates by student subgroup for third grade Reading. The overall proficiency rate for all JCPS students is 34%, compared with a statewide average of 47%.⁵⁴⁸ Several student subgroups fall below this average: male students (32%), Hispanic or Latino students (26%), economically disadvantaged students (25%), African American students (20%), students with disabilities (16%), Native Hawaiian or Pacific Islander (25%), and English learners (20%). The achievement gap is especially pronounced for students with disabilities and English learners. For more information about these groups’ performance, see **Chapter 12: Exceptional Children Education** and **Chapter 13: Multilingual Resources & Supports**.

⁵⁴³ “[Jefferson County Board of Education Policy 09.131 District Racial Equity Policy](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended October 14, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁵⁴⁴ Ibid.

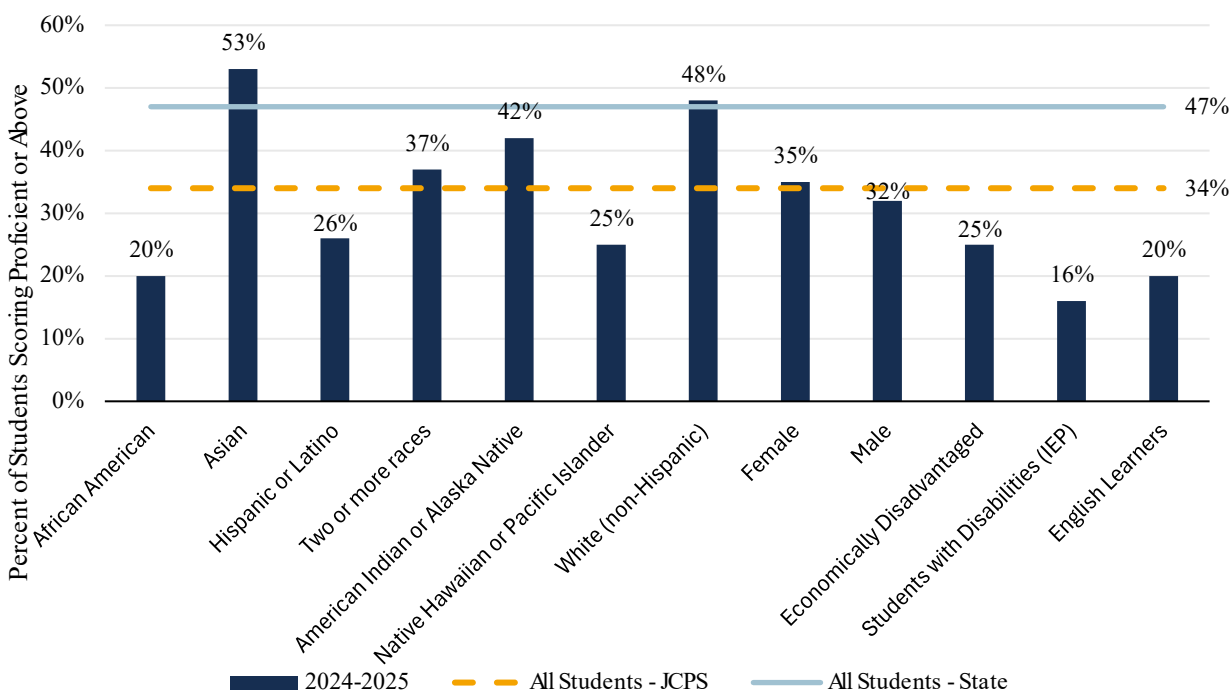
⁵⁴⁵ “[Jefferson County Board Meetings](https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89).” Kentucky School Boards Association. Retrieved February 19, 2026. <https://portal.ksba.org/public/Agency.aspx?PublicAgencyID=89>

⁵⁴⁶ “Jefferson County Board of Education Committees.” Jefferson County Public Schools. Retrieved February 19, 2026. [PDF].

⁵⁴⁷ “[Jefferson County Board of Education Policy 09.131 District Racial Equity Policy](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended October 14, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

⁵⁴⁸ “[Report Card Dashboards: Kentucky](https://reportcard.kyschools.us/kysrc?organization=20242025:999:999000&sid=59d67327-6252-b06e-bb7f-3a12884f871e&gid=7f1c17ab-a36b-abbe-48e7-3a145e8efb07&vizIndex=0).” Kentucky Department of Education. Published August 12, 2025. Retrieved February 19, 2026. <https://reportcard.kyschools.us/kysrc?organization=20242025:999:999000&sid=59d67327-6252-b06e-bb7f-3a12884f871e&gid=7f1c17ab-a36b-abbe-48e7-3a145e8efb07&vizIndex=0>

FIGURE 175: THIRD GRADE KSA READING PROFICIENCY RATES BY STUDENT GROUP, 2024-25 SCHOOL YEAR

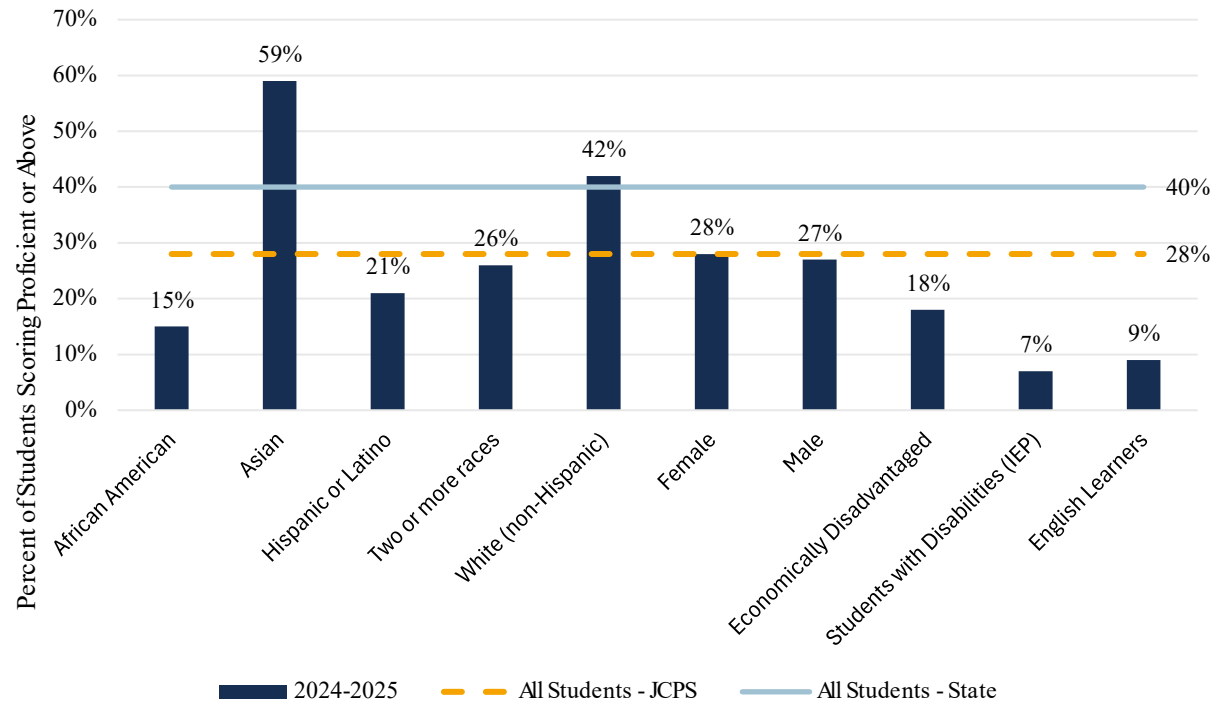


Source: Kentucky Department of Education Report Card Dashboard.

Figure 176 presents KSA proficiency rates for eighth-grade Math by student subgroup. The overall proficiency rate for JCPs students is 28%, compared with a statewide average of 40%.⁵⁴⁹ Similar to reading results, several student subgroups lag behind the average; male students (27%), two or more race students (26%), Hispanic or Latino students (21%), economically disadvantaged students (18%), African American students (15%), English Learners (9%), and students with disabilities (7%). Notably, white students, female students, and Asian students perform at or above the average on both assessments.

⁵⁴⁹ "Report Card Dashboards: Kentucky." Kentucky Department of Education. Published August 12, 2025. Retrieved February 19, 2026. <https://reportcard.kyschools.us/kysrc?organization=20242025:999:999000&sid=59d67327-6252-b06e-bb7f-3a12884f871e&gid=7f1c17ab-a36b-abbe-48e7-3a145e8efb07&vizIndex=0>.

FIGURE 176: EIGHTH GRADE KSA MATHEMATICS PROFICIENCY RATES BY STUDENT GROUP, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.
Note: Data for American Indian or Alaska Native and Native Hawaiian or Pacific Islander students is unavailable due to limited sample size.

More about the District’s vision for student achievement is discussed in **Chapter 9: Curriculum & Instruction**, while additional student assessment results are shared in **Chapter 10: Assessments, Accountability, & Systems Improvement**.

Recommendation	
11.2.a	JCPS should increase its focus on raising the achievement of all students, with particular attention to closing achievement gaps for student subgroups that perform below the overall average.

Teacher Diversity

Finding	
11.3	In contravention of what is currently required by KRS 161.165 and state regulation, the demographic composition of the JCPS teacher workforce does not reflect the racial or ethnic diversity of the JCPS student population.

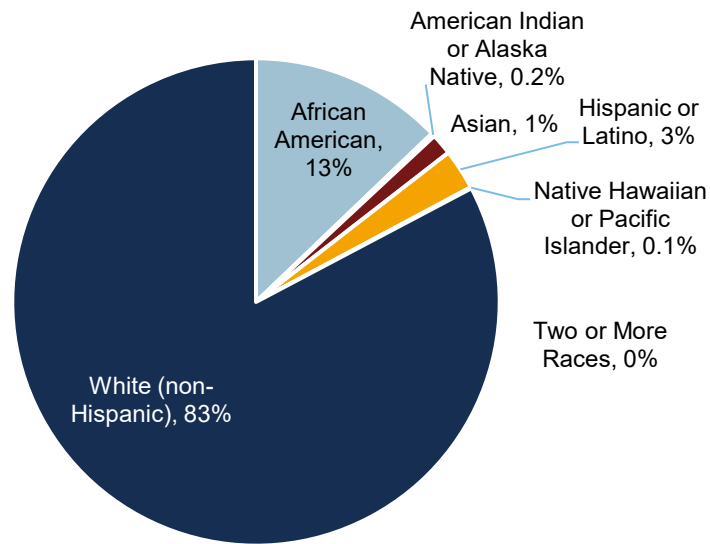
KRS 161.165 requires the “Kentucky Department of Education in cooperation with the Education Professional Standards Board, the Kentucky Board of Education, local school districts, universities, colleges, and the Council on Postsecondary Education” to have a “strategic plan for increasing the number of minority teachers and administrators in the Commonwealth.” 704 KAR 7:130 effectuates that statutory mandate.

JCPS has chosen to carry out this mandate within its District Racial Equity Policy. This policy requires the superintendent to outline strategies in the District Racial Equity Plan for increasing the diversity of staff to

reflect the racial, ethnic, and the linguistic composition of the student population.⁵⁵⁰ Research has shown that a racially diverse educator workforce is associated with improved attendance, student achievement, and high school graduation rates.⁵⁵¹

The 2026-2028 District Racial Equity Plan sets goals of increasing the share of JCPS teachers of color to at least 25% and administrators of color to at least 40%, and retaining at least 90% of teachers of color.⁵⁵² As demonstrated in Figure 177 teachers of color comprise 17% of the JCPS workforce (13% African American, 3% Hispanic or Latino, and 1% Asian) during the 2024-25 school year. This represents a large difference from the JCPS student population, which is 65% non-white.⁵⁵³ JCPS would need to increase the diversity of its teachers by eight percentage points to meet their stated goal by 2028.

FIGURE 177: JEFFERSON COUNTY PUBLIC SCHOOLS TEACHER DEMOGRAPHICS BY RACE/ETHNICITY, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

As shown in Figure 178, teacher diversity has increased at a slow pace over the past three years. Between the 2021-22 and 2024-25 school years, the percentage of teachers of color increased by 1.2 percentage points. At this rate of growth, JCPS is unlikely to meet its goal of 25% teachers of color by 2028.

⁵⁵⁰ “[Jefferson County Board of Education Policy 09.131 District Racial Equity Policy](https://policy.ksba.org/Chapter.aspx?distid=56).” Jefferson County Board of Education Policy Manual. Adopted/Amended October 14, 2025. Retrieved November 26, 2025. <https://policy.ksba.org/Chapter.aspx?distid=56>

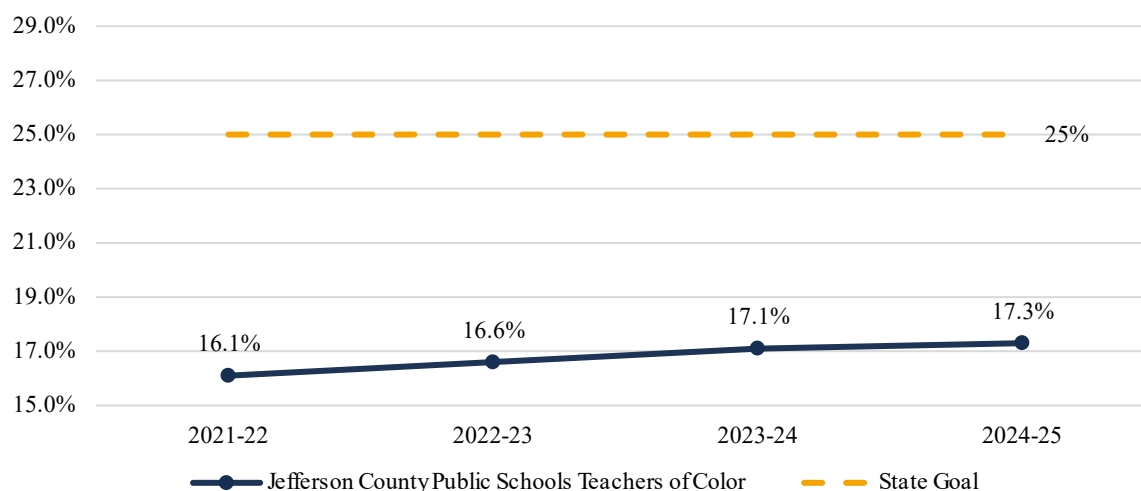
⁵⁵¹ “[Diversifying the Teacher Workforce: Research and Strategies](https://ies.ed.gov/rel-midwest/2025/01/infographic-22).” Institute of Education Sciences. Published August 2021. Retrieved January 7, 2026. <https://ies.ed.gov/rel-midwest/2025/01/infographic-22>

⁵⁵² “[JCPS Racial Educational Equity Plan 2025-2028](https://docs.google.com/document/d/19YSZqXvHyezzlpVNqm6cxuoJ3rzOyi63z_BNQoj6RoE/edit?tab=t.0).” Jefferson County Public Schools. Retrieved January 2, 2026. https://docs.google.com/document/d/19YSZqXvHyezzlpVNqm6cxuoJ3rzOyi63z_BNQoj6RoE/edit?tab=t.0

⁵⁵³ “[Report Card Dashboards: Jefferson County](https://reportcard.kyschools.us/kysrc?organization=20232024:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=b4006d00-0ed8-63dd-db49-3a128836f294&vizIndex=0).” Kentucky Department of Education. Published August 12, 2025. Retrieved January 7, 2026.

<https://reportcard.kyschools.us/kysrc?organization=20232024:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=b4006d00-0ed8-63dd-db49-3a128836f294&vizIndex=0>

FIGURE 178: PERCENTAGE OF JEFFERSON COUNTY PUBLIC SCHOOLS TEACHERS OF COLOR, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

The current District Racial Equity Plan outlines the following activities to meet this goal:

- Attract qualified prospective educators of color
- Recruit and develop high-quality certified teachers of color
- Monitor race disproportionalities in interviews
- Establish Equity-Center Pipeline Initiative⁵⁵⁴

The outlined activities lack specificity and actionable steps, making it unclear how they will effectively address and close the seven percentage-point gap by 2028. More information on JCPS's diversity hiring initiatives and the Louisville Teacher Residency Program is discussed in **Chapter 5: Human Resources**. The District's Racial Equity Policy and Plan are included in the Appendix.

Recommendation	
11.3.a	To comply with current state law, JCPS should evaluate the effectiveness of its current teacher recruitment and retention efforts, with particular attention to underrepresented groups. Based on this assessment, JCPS should strengthen what is working and consider making additional targeted investments to diversify its educator workforce. In complying with these state law requirements, JCPS should ensure it maintains a focus on academic achievement and career readiness.

DIVERSITY, EQUITY, & POVERTY DIVISION

Overview

As a result of a lawsuit filed in the early 1970s, JCPS began a court-mandated busing plan with the goal of desegregating schools in 1975. The court-ordered plan required Louisville and Jefferson County school systems to merge, forming JCPS. In addition to a student busing plan, it also articulated how teachers and

⁵⁵⁴ "JCPS Racial Educational Equity Plan 2025-2028." Jefferson County Public Schools. Retrieved January 2, 2026. https://docs.google.com/document/d/19YSZqXvHyezzlpVNqm6cxuoJ3rzOyi63z_BNQoj6RoE/edit?tab=t.0

administrators would be designated to schools.⁵⁵⁵ The DEP Division was originally established as “Human Resources” in 1984 to ensure the District met desegregation and affirmative action guidelines and to serve as a liaison with the Black community.⁵⁵⁶ The original desegregation court decree was dissolved in 2000, which meant that the District was no longer obligated to maintain busing or integration efforts.⁵⁵⁷ Over time, the division evolved into the Diversity, Equity, and Poverty Division, expanding its mission beyond compliance to focus on equity across JCPS.

Today, the division is charged with ensuring that all students have equitable access to resources needed to succeed and providing districtwide supports to teachers and schools.⁵⁵⁸ The division is led by a Chief Equity Officer who has seven direct reports, including two executive administrators. During the exam team’s data collection, JCPS staff reported that the DEP Division consisted of over 40 staff members. They are responsible for maintaining several programs and initiatives, including but not limited to the items described in Figure 179.

FIGURE 179: DIVERSITY, EQUITY, AND POVERTY DIVISION INITIATIVES

INITIATIVE	Description
Community Engagement & Partnerships	Manages a portfolio of community partnerships that serve students and families, including students experiencing homelessness. More about community partnerships is discussed in Chapter 8: Student Supports, Culture, & Climate .
Diversity Hiring, Including the Louisville Teacher Residency	Houses the Diversity Hiring Specialist position who supports minority recruitment and retention in the District. JCPS’s diversity hiring initiatives are reviewed in Chapter 5: Human Resources .
Supplier Diversity (Minority & Women Business Enterprises)	Oversees vendor diversity, including the Economic Diversity/Equity Program Review Committee (EDEPRC), which engages in the development and promotion of procurement from Minority Business Enterprises (MBE) and Women Business Enterprises (WBE). Supplier diversity is discussed in more detail in Chapter 4: Finance .
Foster Care and Homelessness Programs	Coordinates resources and services for students experiencing homelessness or living in temporary arrangements. The division has a point of contact who coordinates transportation for students living in foster care or experiencing homelessness. Chapter 8: Student Supports, Culture, & Climate discusses foster care and homelessness programs in more detail.
School-based Decision Making (SBDM)	Facilitates School-based Decision Making (SBDM) Councils, which are responsible for establishing school policy. Councils include parent and teacher representatives, in addition to a school administrator. School-based decision making is reviewed in more detail in Chapter 1: District Leadership & Strategy .

⁵⁵⁵ Johnson, Krista. “[Timeline: How JCPS’ Desegregation, Busing Policies Have Changed Since 1975](https://www.courier-journal.com/story/news/education/2025/09/04/timeline-busing-desegregation-jcps-louisville-jefferson-county-schools-history/85257940007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z118459p116150c116150v118459d--xx--b--xx--&gca-ft=63&gca-ds=sophi).” The Courier Journal. Published September 4, 2025. Retrieved February 19, 2026. <https://www.courier-journal.com/story/news/education/2025/09/04/timeline-busing-desegregation-jcps-louisville-jefferson-county-schools-history/85257940007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z118459p116150c116150v118459d--xx--b--xx--&gca-ft=63&gca-ds=sophi>

⁵⁵⁶ “[History of the Diversity, Equity, and Poverty Department](https://www.sutori.com/en/story/history-of-dep--o3YRQxuRhZ8TG5t6N6PcJ9C6).” Jefferson County Public Schools. Retrieved September 30, 2025. <https://www.sutori.com/en/story/history-of-dep--o3YRQxuRhZ8TG5t6N6PcJ9C6>

⁵⁵⁷ Johnson, Krista. “[50 Years Later: What to Know about JCPS’ History of Busing](https://www.courier-journal.com/story/news/education/2025/09/04/50-years-later-what-to-know-about-jcps-history-of-busing/84538458007/).” The Courier-Journal. Published September 4, 2026. Retrieved February 19, 2026. <https://www.courier-journal.com/story/news/education/2025/09/04/50-years-later-what-to-know-about-jcps-history-of-busing/84538458007/>

⁵⁵⁸ “[Diversity, Equity, and Poverty \(DEP\) Division](https://www.jefferson.kyschools.us/page/diversity-equity-and-poverty-division).” Jefferson County Public Schools. Retrieved September 30, 2025. <https://www.jefferson.kyschools.us/page/diversity-equity-and-poverty-division>

Racial Equity Resources	Maintains numerous tools and resources for JCPS educators and schools related to racial equity, which are discussed in more detail below.
Student Enrichment Programs	Manages the core student enrichment programs, “Literacy &.” Students can participate in literacy-based enrichment programs during fall, winter, spring, and summer breaks. In partnership with the YMCA, JCPS also offers the Child Enrichment Program which provides before- and after-school care for JCPS students from kindergarten through eighth grade at schools across the District. Chapter 8: Student Supports, Culture, & Climate includes a review of student enrichment programs.

Source: Jefferson County Public Schools Diversity, Equity, and Poverty (DEP) Division.

As of February 2026, the District plans to reorganize the DEP Division by reducing staff and renaming it the Opportunity & Access Division. Under the reorganization, the division’s staffing would be reduced from more than 40 positions to fewer than 20. Diversity hiring functions, including the Louisville Teacher Residency Program, would shift to Human Resources.⁵⁵⁹ The exam team views this transition of diversity hiring functions to Human Resources positively; it positions the residency program alongside other teacher recruitment and human resources efforts.

DEP Resources & Programming

Finding	
11.4	School-level tools and resources maintained by the DEP Division are disconnected from each other, as well as from other implementation and progress monitoring tools. Specifically, they are disconnected from tools provided by the Schools and Academics Division. JCPS does not maintain data on how these tools and resources are used at the school level to be able to discern their resulting educational impact.

As demonstrated in Figure 180, numerous racial equity resources are created and maintained by the DEP Division. These resources are primarily designed for use at the school level, and each resource has a designated contact person within the DEP Division.

FIGURE 180: RACIAL EQUITY RESOURCES MAINTAINED BY THE DIVERSITY, EQUITY, AND POVERTY DIVISION

TOOL NAME	Description
	The ARE tool is a planning document used to ensure that educators incorporate racially equitable content and practices into their teaching. The tool is accompanied by the ARE Tool Guidebook that provides resources and guidelines with each stakeholder responsible for its implementation.
Affirming Racial Equity (ARE) Tool	The tool includes 36 lesson descriptors associated with six core components. The tool states that educators should strive to implement one lesson descriptor from all six components. Examples of lesson descriptors include the following: • “The lesson’s materials reflect diverse cultures and identities.” • “The lesson’s materials allow students to position themselves within the content to affirm their racial identities.”

⁵⁵⁹ “[Special Board of Education Meeting February 13, 2026](https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=).” Jefferson County Board of Education. February 13, 2026. Retrieved February 19, 2026.
<https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=89&PublicMeetingID=53497&AgencyTypeID=>

	• “Teachers are aware of their own internal biases and how those biases impact students’ achievement and engagement in the classroom.” • “Teachers ensure all students acquire necessary academic language to perform at high levels.” The ARE Tool is included in the Appendix.
Racial Equity Analysis Protocol (REAP)	REAP is used as a screening tool for school leadership to determine if decisions marginalize or negatively impact a group of students. The DEP Division recommends using it at SBDM, Instructional Leadership Team, and Faculty meetings. THE REAP is included in the Appendix.
Equity Monitoring Progress Tool (EMPT)	The EMPT is a self-assessment tool that every school is required to use to measure fidelity to JCPS Racial Equity Policy. Schools assess their progress in six domains: 1. Diversity in curriculum, instruction, and assessment 2. Professional development 3. School culture and climate 4. Programmatic access 5. Staffing and classroom diversity 6. Reflections of Equitable Practices Annually in the spring, the DEP Division reviews the school’s assessment and provides feedback. Schools then create SMART goals for each component of the EMPT; these goals are included in the school racial equity plans. The DEP Division offers EMPT training for school administrators. The EMPT is included in the Appendix.
Leading for Equity, Accountability, Support, and Expectations (LEASE) Tool	The LEASE tool is a reflective document for school leaders to identify concerns, strengthen racial equity systems, and ensure priorities align with equity goals. It supports leaders in evaluating and improving programs and practices that promote racial equity. It includes seven questions, including items like “how have you remediated equality practices of various systems in your building to bring racial equity to historically underserved students?” The LEASE Tool is included in the Appendix.
Equity Screener ⁵⁶⁰	The equity screener is used as part of the school and Central Office leadership hiring process. It requires candidates to provide evidence of their competencies and demonstrated actions across four dispositions (data-driven equity solutions, culturally competent practices, disruptive equity leadership, reflection and growth on equity practice).
Equity Scorecard ⁵⁶¹	The Equity Scorecard provides publicly available, real-time data on key metrics such as academic proficiency, suspension rates, attendance, transition readiness, access and opportunity, and teacher demographics. Data is disaggregated by race and gender, allowing schools and the community to monitor equity progress

⁵⁶⁰ Racial Equity Specialist Dwan Williams, *Screening for Equity: Equity Leadership Screener*. Retrieved May 22, 2026. https://drive.google.com/file/d/1U7_Sy75wbFnMmTjIQdVBt4QWPQi2DjJA/view.

⁵⁶¹ Equity Scorecard. Retrieved on May 22, 2026. <https://assessment.jefferson.kyschools.us/DMC/EE/eeHome>.

transparently. It serves as a benchmarking and progress-monitoring tool for equity plans. The Scorecard is available on JCPS's website.

Source: Jefferson County Public Schools Racial Equity Policy and DEP Anchor Documents.

The EMPT and Equity Screener are required tools, and the DEP Division monitors implementation. However, it is unclear whether the Division's other tools and resources are used consistently or with fidelity across schools. Except for the EMPT, the other DEP tools were rarely mentioned during the exam team's interviews and focus groups with District staff. The EMPT was discussed during focus groups with principals, and they shared that the EMPT felt disconnected from other planning and reporting requirements. In addition, the examination team did not observe the use of DEP tools and resources during school visits.

This examination did not focus on school-level implementation, and therefore the team cannot draw definitive conclusions about how DEP tools and resources are used in practice at the school level. Rather, this finding reflects what the team learned based on interviews, focus groups, and observations. As a result, the examination team recommends further study at the school level to understand how DEP tools and resources are implemented and experienced in practice. Further study should also assess their impact on student outcomes.

As shown in Figure 180, the DEP Division maintains multiple tools that serve similar purposes, including two separate reflection protocols for school leaders (the REAP and LEASE tools), the ARE tool for assessing instructional practices, and the EMPT for self-assessment against the District Racial Equity Plan. For ease of use, the DEP Division should consider how to combine the four reflection and assessment protocols designed for school leaders. While each tool is intended to support equity implementation, the number and variety of tools may contribute to fragmented and inconsistent use in schools. They are also standalone resources, rather than being integrated into resources from other Central Office divisions, such as Academics and Schools.

Recommendations	
11.4.a	JCPS should assess the efficacy of the DEP tools and resources and how educators use them in practice. Based on this assessment, the recommended actions in Recommendation 10.3.b, current federal guidelines, and in coordination with other Central Office divisions, JCPS should consider combining, reducing the number of, or eliminating the tools.
11.4.b	JCPS should conduct targeted, school-level follow-up to better understand how DEP tools and resources are implemented and experienced in practice. Further study at the school level will provide needed insight into actual use and effectiveness.

DISTRICT & SCHOOL RACIAL EQUITY PLANS

District Racial Equity Plan

Findings	
11.5	The 2025-2028 JCPS Racial Equity Plan lacks clearly defined, actionable activities, progress measures, and goals.
11.6	The JCPS Racial Equity Policy and Plan refers only to students of color, when there are other student subgroups with persistent achievement gaps.

As discussed in the **District Racial Equity Policy** section, the Board requires the development of a District Racial Equity Plan. The current plan, covering 2025 to 2028, details activities and progress measures for each of the five policy directives: diversity in curriculum, instruction, and assessment; school culture and climate; staffing and classroom diversity; programmatic access; and evaluating board policy and administrative procedures.

Given the size of the District, the 2025-2028 District Racial Equity Plan is relatively high-level and generic. It includes three to seven activities for each policy directive. Many of the activities are things you would expect any school district to focus on, including “attract qualified prospective educators of color” and “provide students of color with self-affirming opportunities to reflect on personally important values.”⁵⁶² The activities are not specific to the unique challenges JCPS is facing to close its student achievement gap.

Similarly, the District Racial Equity Plan’s progress measures are often vague, including goals like “increase student % attendance by race” and “monitor race disproportionalities in interviews.”⁵⁶³ While these measures are commonly associated with efforts to close achievement gaps, they did not feel specific or customized to JCPS’s baseline data.

Finally, the Board Policy and District Racial Equity Plan’s focus is limited to “students of color,” “Brown and Black students,” and “educators of color.” Given the significant achievement gaps among other student subgroups, particularly English learners and students with disabilities, the District would benefit from broadening the scope of its policy to expand beyond race to address the needs of all groups with persistent gaps. The District’s Racial Equity Policy and Plan are included in the Appendix.

District Racial Equity Plan Progress Tracking Tool

JCPS maintains a public-facing Google spreadsheet, called the District Racial Equity Plan Progress Tracking Tool that tracks implementation of the District Racial Equity Plan. The tool is organized by the five policy directives, with each tab listing associated activities, progress measures, baseline data, goals, status, and interim progress data. The tool reflects a commitment to data transparency. In 2025, the District updated interim progress data bimonthly, for a total of six updates. However, 17 of the 21 tool activities do not include defined goals, making it difficult for the public to interpret progress without clear benchmarks.⁵⁶⁴

Recommendations	
11.5.a	JCPS should revise the 2025-2028 JCPS Racial Equity Plan and Progress Tracking Tool to include clearly defined and actionable activities, progress measures, and goals, with particular emphasis on academic achievement and career readiness.
11.6.a	JCPS should revise the District Racial Equity Policy to include all subgroups that consistently demonstrate achievement gaps relative to the overall student population.

School Racial Equity Plans

Findings	
11.7	Based on a sample of school racial equity plans, these plans are more actionable than the District Racial Equity Plan, but they show uneven rigor and lack accountability structures that extend beyond their schools.
11.8	Principals reported that the school racial equity plans felt burdensome and disconnected from other goal setting, progress monitoring, and reporting requirements.
11.9	There is no direct connection between the District Racial Equity Plan and individual schools’ Racial Equity Plans.

The exam team reviewed a sample of 21 school racial equity plans across elementary, middle, and high schools from the 2024-25 school year. Unlike the District Racial Equity Plan, each school plan includes

⁵⁶² “[JCPS Racial Educational Equity Plan 2025-2028](https://docs.google.com/document/d/19YSZqXvHyezzlpVNqm6cxuoJ3rzOyi63z_BNQoj6RoE/edit?tab=t.0).” Jefferson County Public Schools. Retrieved January 2, 2026. https://docs.google.com/document/d/19YSZqXvHyezzlpVNqm6cxuoJ3rzOyi63z_BNQoj6RoE/edit?tab=t.0

⁵⁶³ Ibid.

⁵⁶⁴ “[District REP Progress Tracking Tool](https://docs.google.com/spreadsheets/d/16qOp-JD2ozWyKNjYyK2cl0F4oV9UA7hXDMLVqU7W5nY/edit?gid=0#gid=0).” Jefferson County Public Schools. Retrieved January 2, 2026. <https://docs.google.com/spreadsheets/d/16qOp-JD2ozWyKNjYyK2cl0F4oV9UA7hXDMLVqU7W5nY/edit?gid=0#gid=0>

goals tied to specific policy expectations outlined in the District Racial Equity Policy. Schools are not required to reference the goals or activities in the District's plan. While this direct alignment to the policy is a strength, the lack of alignment between the District and school-level plans make it difficult for the District to assess progress towards its plan.

The exam team found the plans to be generally actionable, but they showed uneven rigor. Most schools presented clear, time-bound SMART goals and the required components such as relevant actions, tracking tools, monitoring frequency, and use of racial equity funds. The specificity and measurability of goals varied, with some plans providing detailed metrics and others offering broad actions that are difficult to evaluate. Several plans also lacked clear student-level outcomes, focusing instead on adult implementation. For example, one goal stated that “teachers will implement culturally responsive strategies every day” without articulating what students should achieve as a result. Overall, elementary schools tended to incorporate more procedural tasks (e.g. conducting professional development or facilitating walkthroughs with the monitoring protocols) in their plans. On the other hand, middle and high schools incorporated more impact-oriented metrics related to belonging, discipline, and program access.

Accountability in schools’ racial equity plans is primarily driven by internal monitoring structures, with little evidence of external oversight. Across all grade levels, internal monitoring structures such as Professional Learning Communities (PLCs), leadership teams, and racial equity committees were consistently named as the party responsible for monitoring and evaluating progress towards goals. Notably, every school racial equity plan sampled identified the tracking tools (e.g. ARE Tool, Racial Equity Walkthrough Protocol, and the Comprehensive School Survey (CSS)) and monitoring cycles (e.g. quarterly survey review) they would use.

Although every plan outlined how progress would be tracked and how often, the level of detail varied. Middle schools generally described more structured routines, while some high school plans were less robust. Across all levels, accountability remained largely process-focused rather than performance-driven, with no clear articulation of next steps if goals were not met, no external reporting expectations, and limited specification of individual role-level responsibility. As a result, while systems for tracking existed in every plan, the strength and enforceability of accountability varied, depending on how thoroughly each school defined actions, metrics, and oversight.

As discussed in **Chapter 9: Curriculum & Instruction**, principals reported a need for greater coherence across Central Office divisions, including in their reporting requirements. Principals shared that different divisions work independently and require different plans and reports, creating burdensome reporting requirements for principals. The EMPT and School Racial Equity Plan were specifically named as one of the reporting requirements that felt burdensome and disconnected from other requirements.

Recommendations	
11.7.a	JCPS should review school equity goals and progress-monitoring activities to ensure they are all rigorous, actionable, and actually lead to improved academic outcomes for all students, with particular emphasis on academic achievement and career readiness.
11.8.a	JCPS should streamline the requirement for each school to develop a racial equity plan within other school-level goal setting, progress monitoring, and reporting requirements.
11.8.b	JCPS should reduce school-level reporting on racial equity plans through the Equity Monitoring Progress Tool (EMPT) from four times per year to twice per year.
11.9.a	JCPS should strengthen alignment between District- and school-level Racial Equity Plans to better understand progress on the District Racial Equity Plan, with particular emphasis on academic achievement and career readiness.

CHAPTER 12: EXCEPTIONAL CHILDREN EDUCATION

EXCEPTIONAL CHILDREN EDUCATION DEPARTMENT

JCPS serves roughly 13,000 students with disabilities with Individualized Education Programs (IEPs) through its special education program and about 4,000 students with qualifying impairments under Section 504 of the Rehabilitation Act.⁵⁶⁵ Programs and services for children with disabilities in JCPS, including both special education and Section 504, are overseen by the Exceptional Children Education (ECE) Department. The ECE Department also manages JCPS's Early Childhood programs serving at-risk students with disabilities ages three to four and income-eligible four-year-old students without disabilities. The ECE Department, additionally, oversees the Advance program for high achieving students in grades 4–12 and Gifted and Talented programs, including the Primary Talent Pool for grades K–3 and programs for formally identified students in grades 4–12.

The ECE Department at JCPS is led by the Chief of Exceptional Child Education, who reports directly to the District superintendent. The Chief of Exceptional Child Education directly supervises an ECE leadership team that includes:

- Executive Administrator ECE
- Executive Director ECE and Special Programs
- Executive Director Early Childhood Education
- Manager ECE – Administration
- Supervisor ECE – Community Relations

Each of these Central Office leaders has direct supervision responsibilities for Central Office staff, including directors, assistant directors, managers, supervisors, coordinators, secretaries, and data management technicians. On March 10, 2026, JCPS presented to the Jefferson County Board of Education a plan to reorganize the ECE Department as part of the District's broader reorganization of its Central Office. The proposal would have eliminated the Chief of ECE and executive administrator roles and replaced them with a new Executive Officer of ECE, reporting to the superintendent and overseeing two executive directors. Several supervisory and coordinator roles were proposed for elimination or reassignment under streamlined reporting lines. A shift in supervision of the District's Gifted and Talented program from ECE to the Chief of Academics, and a reduction in work year calendars for some staff roles, such as school psychologists, behavior specialists, and occupational therapists, were also included in the proposal. However, on March 31, 2026, JCPS presented a revised proposal to the Board with additional input from district stakeholders. The revised proposal included the elimination of the Chief of Exceptional Children and executive administrator roles from the prior proposal. The new proposal, however, maintained the current number of contract days for related services providers, such as occupational and physical therapists, with smaller cuts to the number of contract days for other staff, such as school psychologists and behavior support specialists. The Board approved the revised proposal on March 31, 2026.

Special Education Policies & Procedures

JCPS's ECE Department is responsible for ensuring the District adheres to federal and state requirements for educating students with disabilities. School districts must have policies and procedures in place that facilitate practices that comply with applicable state and federal laws. These policies guide a district's practices related to Child Find, evaluation and eligibility determination for special education, and providing services to students with disabilities in general education settings to the maximum degree possible. This section examines JCPS's established policies, procedures, and special education practices.

⁵⁶⁵ "KY Special Education Child Count Dashboard." Kentucky Department of Education. Retrieved August 25, 2025. [https://kystats.ky.gov/Latest/SPEDChildCount.](https://kystats.ky.gov/Latest/SPEDChildCount;); "504 Data- 10.24." Jefferson County Public Schools. [PDF].

Child Find

The federal Individuals with Disabilities Education Act (IDEA) and state Child Find regulations require districts to identify and evaluate any child suspected of having a disability and provide appropriate special education services if eligible.⁵⁶⁶ This obligation applies to all children within the district, including those who are homeless, in state custody, attending public or private schools, or homeschooled.⁵⁶⁷

- JCPS maintains updated Child Find procedures, most recently revised in 2024, for students ages 3–21, including preschool children in early intervention programs. These procedures apply to all resident students, including highly mobile students, migrant students, foster youth, wards of the state, and students advancing from grade to grade.⁵⁶⁸
- JCPS staff expressed strong confidence in the district's Child Find efforts, noting effective collaboration within the ECE Department to conduct outreach to families and schools about eligibility requirements.
- Staff also highlighted training for surrogate parents, Multi-Tiered Systems of Support (MTSS) training for school teams, and the addition of a public special education support request form (which is routed to ECE supervisors for follow-up).

An Admissions and Release Committee (ARC) is a group of individuals responsible for developing an IEP for an eligible student with a disability. An ARC develops IEPs and must include required members such as parents, general and special educators, and an administrator.⁵⁶⁹ Schools designate an ARC Chairperson who is responsible for coordinating the efforts of ARCs within the school to develop student IEPs, ensuring participation by the appropriate team members, and meeting required state and federal timelines. Supported by an updated resource guide, ARC Chairpersons and back-up ARC Chairpersons for JCPS schools complete annual training on Child Find, referrals, and evaluation processes. Referrals of a student who is suspected of having a disability may come from a parental request or be based on MTSS data collected by the student's teachers and school staff. The District's guidance describes practices for documenting interventions attempted with the student and their result along with examples to illustrate documentation practices.⁵⁷⁰

After parental consent, ARC Chairs submit a form that alerts the Data Management and Research Technician (DMRT) that a student requires an evaluation to determine if the student requires special education services. DMRT then assigns a lead psychologist to complete evaluations and ensure required timelines are met. Psychologists receive updated case lists every two weeks from the ECE Department. JCPS provides detailed guidance for lead psychologists regarding different scenarios, such as when a student's school of enrollment does not match the case list or when a student moves out of JCPS's boundary to a different Kentucky school district.⁵⁷¹

JCPS also staffs a Diagnostic Center located near the JCPS Central Office and Welcome Center. The Diagnostic Center has a manager and a team of multidisciplinary staff to evaluate students ages 3–21, including those transitioning from IDEA Part C (early intervention) to IDEA Part B (school age) by age three.⁵⁷²

Both federal and Kentucky regulations require districts to conduct Child Find for students parentally enrolled in private schools within district boundaries.⁵⁷³ Child Find must ensure equitable participation and comparable timelines to those used for public school students. If a private school student is found eligible, JCPS develops a Private School Service Plan (PSP) that outlines services the District will provide to

⁵⁶⁶ 20 U.S.C §1412(a)(3); 34 C.F.R. §300.111; 707 KAR 1:300

⁵⁶⁷ 34 C.F.R. §300.311; 707 KAR 1:300

⁵⁶⁸ "Exceptional Child Education Procedures." Jefferson County Public Schools. 2024.

⁵⁶⁹ 707 KAR 1:002; 707 KAR 1:320

⁵⁷⁰ "25-26 JCPS ARC Chairperson Training." Jefferson County Public Schools. [PDF].

⁵⁷¹ "Lead Psychologist Monitoring System-10.24." Jefferson County Public Schools. [PDF].

⁵⁷² 34 C.F.R. §300.323(b)(1); 707 KAR 1:320

⁵⁷³ 34 C.F.R. §300.131; 707 KAR 1:370

address the private school student's disability-related needs.⁵⁷⁴ JCPS engages private schools through outreach efforts. The District surveys local private schools regarding their participation in IDEA-B services as well as other federal programs. JCPS offers informational sessions for private school representatives — who indicated they need additional information on the FY24, FY25, and FY26 surveys — and maintains attendance records for the representatives who participate. District staff also reported during interviews that private schools are provided with documents related to Child Find, such as posters and letters with JCPS contact information to share with families. Eligible students served through PSPs are tracked in the state student information system. Recent child counts for parentally placed private school students with disabilities were 1,014 (2021–22), 707 (2022–23), and 636 (2023–24).⁵⁷⁵

Identification of Students with Disabilities

The ECE Department within JCPS has developed resources to support schools in conducting student evaluations and eligibility determinations that include a presentation deck available to District staff (published via Google Slides), annotated versions of each KDE disability checklist, and a District inventory of evaluation tools and assessment resources aligned to the special education eligibility determination process. The presentation deck, updated for the 2024-25 school year, outlines the 14 eligibility categories, accompanied by guidance for both initial evaluations and re-evaluations. This deck also includes side-by-side summaries of required components and aligned assessment types as well as additional considerations for each student's ARC to promote consistency in decision-making practices.⁵⁷⁶ The guidance outlined in the District's eligibility requirements slide deck is comprehensive of guidance across all disability areas outlining definitions, regulatory requirements, required assessments, and optional considerations. Each eligibility category follows a consistent format and pattern, provides explicit guidance for decision points related to the eligibility determination process and includes provider consultation guidance as well (i.e., which school staff are best positioned to support follow-up questions related to student specific cases). Cross-contextual notes and District forms are embedded throughout the guidance. In some instances, the guidance in the presentation includes lengthy text typically found in manuals. While the District should consider whether a PowerPoint presentation is the most appropriate format for sharing the information, the current materials are clear and accurate.

JCPS has also produced annotated versions of the KDE disability eligibility checklists. These enhanced checklists feature color-coded sections that connect each component of the checklist to relevant assessment types and sources of supporting evidence, such as parent interviews, English language development assessment results for multilingual learners, and behavioral rating scales. This format allows ARC teams to match appropriate evaluation tools and data sources to present student challenges.⁵⁷⁷ Additionally, the ECE Department maintains a detailed inventory of all test kits available through the department. The inventory organizes assessments by area of need — such as adaptive behavior, early childhood, or cognitive functioning — to allow evaluators to identify the most suitable instrument for a student's evaluation across suspected disability categories.⁵⁷⁸

⁵⁷⁴34 C.F.R. §300.132; 707 KAR 1:370

⁵⁷⁵ "Child Find Counts for Parentally Placed Private Schools – 10.24." Jefferson County Public Schools. [Microsoft Word].

⁵⁷⁶ "[Eligibility Requirements per Disability \(2024-2025\)](#)." Jefferson County Public Schools. Retrieved October 30, 2025.

https://docs.google.com/presentation/d/1bNwJhXBZD8STc_bjOGgF8g9wcyZSzm_cLhnEvj1FRo8/edit?slide=id.gdfa6a51e1a_0_103#slide=id.gdfa6a51e1a_0_103

⁵⁷⁷ "Guidance Eligibility – 10.24." Jefferson County Public Schools. [PDF].

⁵⁷⁸ "ECE Assessment Inventory Master List." Jefferson County Public Schools. [Microsoft Excel].

Findings	
12.1	JCPS identifies students with Specific Learning Disabilities at rates below the national and statewide averages and identifies students with Other Health Impairments at higher rates than the national or statewide averages.
12.2	JCPS exhibits disproportionality in disability identification, with Hispanic students over-represented in multiple disability categories and Black students under- or over- represented in several categories when compared to District averages.

Nationally, based on data from the National Center for Education Statistics, as of the 2022-23 school year, there were 7.5 million school children with disabilities served under the federal IDEA. In the 2023-24 school year, JCPS served about 13,000 students with disabilities through the District's special education program. Figure 181 outlines the five disability identification categories that are most frequently identified nationally in comparison to Kentucky statewide identification rates and JCPS district identification rates in the 2024-25 school year. A Specific Learning Disability (SLD) is a disorder that impacts a student's academic learning in reading, writing, or mathematic calculation and reasoning. SLDs include conditions such as dyslexia or dysgraphia.

Speech Language Impairments are communication disabilities that impact a student's educational performance such as verbal articulation challenges or stuttering. Other Health Impairment (OHI) is a category that includes attention deficit hyperactivity disorder (ADHD) and health conditions that may impact a student's learning such as diabetes or Tourette's syndrome. Autism is a disability that affects verbal and nonverbal communication and social interaction. Characteristics of Autism can include repetitive interests or bodily movements, heightened sensory needs, or resistance to changes in routine. Developmental Delay is a category used for students ages three through nine who demonstrate physical, cognitive, communication, adaptive, or social/emotional development that are below age-expected levels.

FIGURE 181: COMPARISON OF DISABILITY IDENTIFICATION RATES FOR THE FIVE MOST COMMONLY IDENTIFIED DISABILITY TYPES NATIONALLY, 2024

DISABILITY IDENTIFICATION	United States	Kentucky	Jefferson County Public Schools
Specific Learning Disability (SLD)	32%	16.7%	13.4%
Speech Language Impairment	19%	25.8%	15.5%
Other Health Impairment (OHI)	15%	15.1%	21.5%
Autism	13%	12%	15.5%
Developmental Delay	7%	12.2%	13.2%

Source: National Center for Education Statistics Condition of Education and Kentucky Department of Education Kentucky Special Education Child Count Dashboard.

JCPS identifies students with SLDs at lower rates than the national or state averages. A comparison of state and federal data for eligible students with SLDs indicates JCPS's identification rate in this category is about 19 percentage points lower than the national average and just over 3 points lower than the state average for Kentucky.

OHI is the most prevalent disability type among students served by special education in JCPS. The District is about 6.5 points higher than the national and state averages. JCPS staff speculated during focus groups that the higher number of JCPS students identified under the OHI eligibility category may be correlated with fewer students being identified in the category of Emotional/Behavioral Disabilities (EBD). A student with an EBD experiences challenges with learning due to an impaired ability to regulate their emotional state and behavioral responses. EBD may present in the school setting as pervasive feelings of depression or unhappiness or atypical fear or behavior during normal situations or circumstances. A student with an EBD

may also have difficulty building and maintaining social relationships with other students or adults. The district has not, however, made any concrete effort to explain or determine why OHI is as prevalent as it is within the district.

FIGURE 182: COMPARISON OF DISABILITY TYPE IDENTIFICATION BY SCHOOL DISTRICT, 2024-25 SCHOOL YEAR

DISABILITY IDENTIFICATION	Kentucky	Jefferson County Public Schools	Boone County Schools	Fayette County Public Schools	Hardin County Schools
Specific Learning Disabilities (SLD)	16.7%	13.4%	27.3%	18.3%	12.8%
Other Health Impairment (OHI)	15.1%	21.5%	12.2%	15.5%	15.4%
Emotional/Behavioral Disabilities (EBD)	3.3%	4.3%	2.8%	2.7%	3.8%

Source: Kentucky Department of Education Kentucky Special Education Child Count Dashboard.

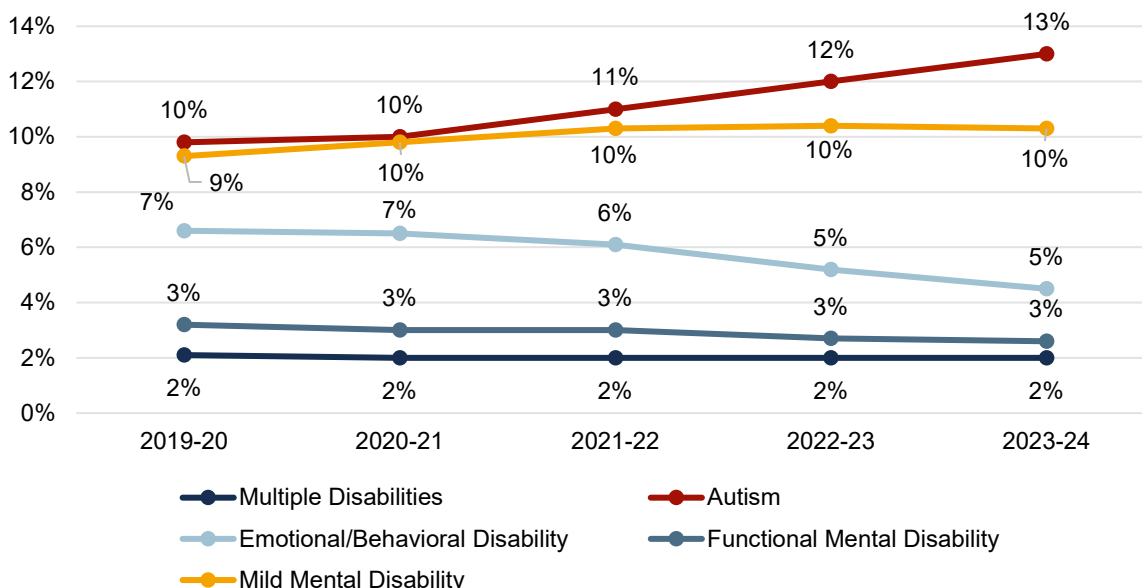
A comparison of 2024-25 child count data for students with disabilities by disability identification area between JCPS and Boone County, Fayette County, and Hardin County school districts reveal identification rates for OHI in each comparison districts are more in-line with the national and state averages, with the exception of Boone County which had a lower rate of OHI identification than the state average.

Identification rates for students with EBD in Boone County School District and Fayette County School District were below the state average, the identification rate for students with EBD in Hardin County School District aligns with state average, and JCPS's EBD identification rates were above the state average. The number of students identified with SLDs in all districts was lower than the national average of 32%. Boone County Public Schools and Fayette County Public Schools demonstrated SLD identification rates above the state average, and Hardin County Public Schools and JCPS show SLD identification rates below the state average.

A further review of historic data published on the KY Special Education Child Count Dashboard reflects that the percentage of students with EBD in JCPS decreased approximately two percentage points from 2019-20 school year to 2023-24. However, the EBD identification rate decreased across the same time span in Boone County, Fayette County, and Hardin County school districts as well. Historical data also suggests the overall percentage of JCPS students with OHI decreased slightly over the same time period as the decrease in percentage of students identified with EBD. However, the 2024-25 percentage of students with EBD in JCPS remains slightly higher than the state average, as well as that of other larger Kentucky school districts, while the rates of OHI identification in JCPS are higher than what is demonstrated in other larger school districts.⁵⁷⁹

⁵⁷⁹ "Kentucky Special Education Child Count Dashboard." Kentucky Department of Education. Retrieved August 25, 2025. <https://kystats.ky.gov/Latest/SPEDChildCount>

FIGURE 183: PERCENTAGE OF JEFFERSON COUNTY PUBLIC SCHOOLS STUDENTS WITH LOW INCIDENCE DISABILITIES BY DISABILITY CATEGORY, 2019-2024



Source: Kentucky Department of Education Kentucky Special Education Child Count Dashboard.

Analysis of trends in JCPS students identified with low-incidence disability types (i.e., those disabilities which are less commonly identified) indicates the number of students identified with Autism has continued to rise in the district since the 2020-21 school year. Identification rates of students with Mild Mental Disabilities, Functional Mental Disabilities, and Multiple Disabilities have remained relatively stable during the same period. Students identified with Emotional/Behavioral Disabilities declined gradually over five years to 5% of students in the district's special education program by the 2023-24 school year.

The IDEA eligibility category Intellectual Disability encompasses two Kentucky state eligibility categories: Mild Mental Disability (MMD) and Functional Mental Disability (FMD). The national average for students served by special education with Intellectual Disabilities is about 6%.⁵⁸⁰ In JCPS, MMD and FMD eligibilities represent about 10% and 3% of students served by special education.

A review of JCPS guidance related to eligibility for specific learning disabilities, as well as other disability types, aligns with the requirements of the IDEA and Kentucky regulations.⁵⁸¹ It is possible the bifurcation of Intellectual Disability into a mild and more significant eligibility classification at the state level increases the possibility that students who may otherwise be identified with specific learning disabilities are determined eligible under the Mild Mental Disability category. Further exploration and analysis are needed to ascertain whether this is a contributing factor to JCPS's lower rates of SLD identification and whether any additional factors may be impacting the eligibility determination process.

As illustrated in Figure 184, an analysis of JCPS's disability identification across disability eligibility categories and student race/ethnicity reflects meaningful differences across student sub-groups.

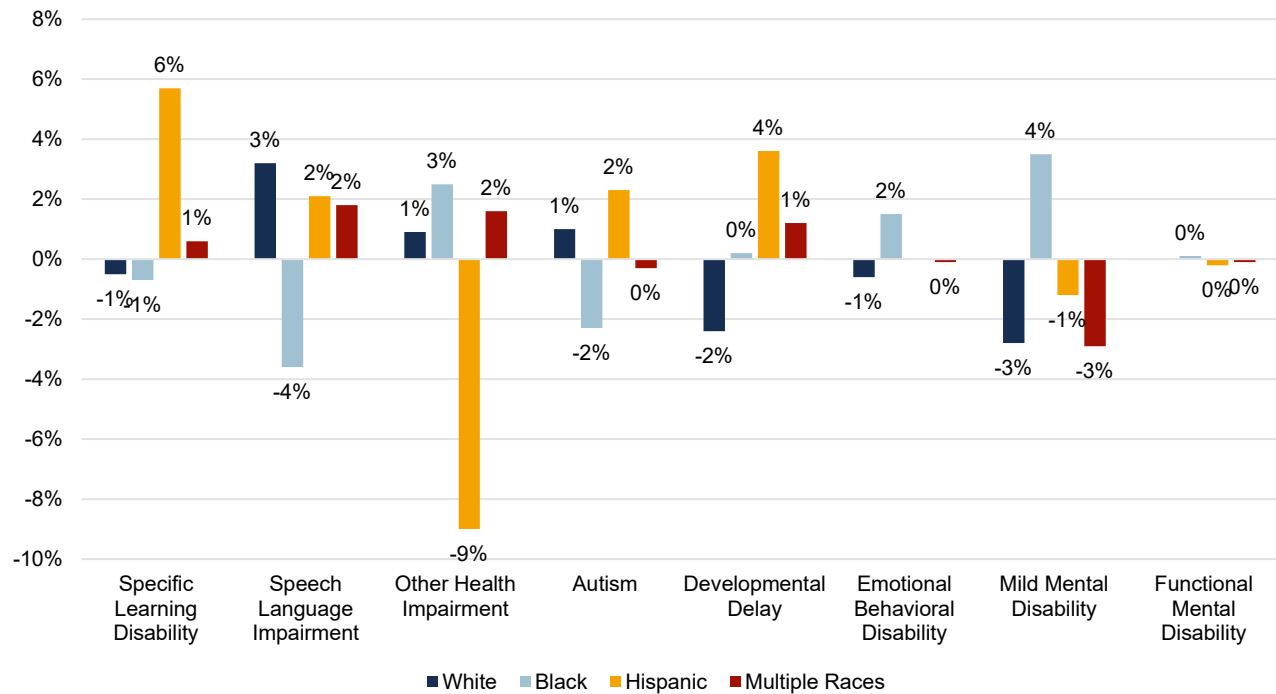
- Hispanic students are overrepresented in SLD identification than peers of other sub-groups at a rate six percentage points higher than the District average.
- The percentages of Hispanic students identified with Autism and Developmental Delays exceed the District averages.

⁵⁸⁰ "Condition of Education – Students with Disabilities." National Center for Education Statistics. Retrieved August 25, 2025. <https://nces.ed.gov/programs/coe/indicator/cgg/students-with-disabilities>

⁵⁸¹ 34 C.F.R. 300.304; 34 C.F.R. 300.306; 707 KAR 1:310

- Hispanic students are the most overrepresented sub-group within Developmental Delay. They are underrepresented in the categories of OHI and EBD as compared to peers in other sub-groups.
- Black students are represented four percentage points lower than the District average in Speech Language Impairment, while white students are represented at 3 percentage points higher than the District average.
- Black students are also slightly overrepresented than the District averages in OHI and EBD.
- Black students are also represented in MMD four percentage points higher than the District average and higher than any other student sub-group in this eligibility type.

FIGURE 184: JEFFERSON COUNTY PUBLIC SCHOOLS STUDENTS WITH DISABILITIES BY ELIGIBILITY TYPE AND RACE/ETHNICITY COMPARED TO THE DISTRICT AVERAGE, 2023-24 SCHOOL YEAR



Source: Kentucky Department of Education Kentucky Special Education Child Count Dashboard.

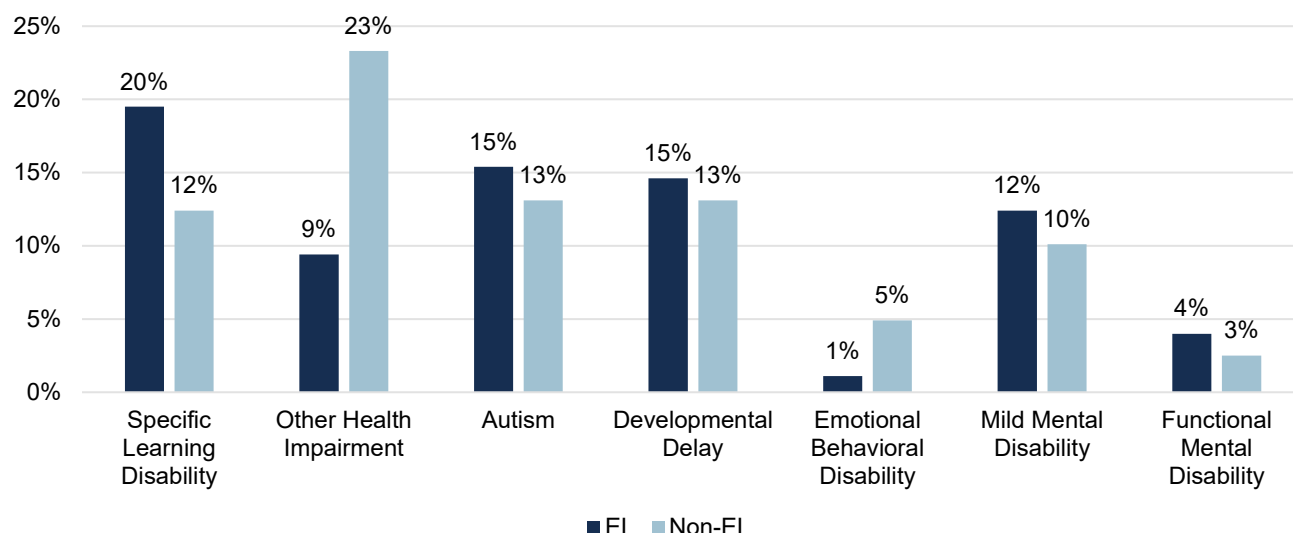
Recommendations	
12.1.a	JCPS should review historic and current evaluation reports to examine the degree to which evaluation and eligibility processes are implemented consistently with the District's guidance and expected procedures.
12.1.b	JCPS should use the results of its record review to determine whether training is needed to ensure all school teams are appropriately identifying students with disabilities in accordance with the District's guidance, as well as state and federal laws.
12.1.c	If training is necessary to maintain fidelity to evaluation and eligibility determination processes, JCPS should provide that training. Training may need to be provided universally to all school teams, targeted schools, or both.
12.2.a	In reviewing current and historical evaluation reports, JCPS should explore whether inconsistencies exist in the application of eligibility criteria across sub-groups of students, specifically related to SLD, OHI, Developmental Delay, EBD, Autism, and MMD.

Identification of Multilingual Learners with Disabilities

Students learning a new language may experience differences in their learning process compared to students who are already fluent in the language of instruction. For example, multilingual students may take longer to verbally respond in the language they are learning or experience challenges with reading and writing while they gradually become more fluent in a new language. Since language development is a process and some students take more time than others to acquire a second language, it can present a challenge for educators to know whether a student is experiencing difficulties in school due to language acquisition needs or the presence of a potential disability. Careful monitoring and review of student progress with educators familiar with the stages of second language acquisition as well as educational strategies for teaching multilingual learners is essential to appropriately differentiating language learning needs from needs related to a disability. For these reasons, multilingual students are at higher risk for over-identification as students with disabilities than monolingual students, especially within categories of disability that impact the development of verbal communication, listening, reading, and writing (such as learning disabilities or speech and language impairments).

Findings	
12.3	JCPS students who are multilingual are more likely to be identified as students with Specific Learning Disabilities, Autism, Developmental Delays, Speech or Language Impairments and Mild Mental Disabilities.
12.4	JCPS does not provide written guidance on IEP development for multilingual learners.

FIGURE 185: JEFFERSON COUNTY PUBLIC SCHOOLS DISABILITY IDENTIFICATION BY ELIGIBILITY TYPE AND ENGLISH LEARNER (EL) STATUS, 2023-2024 SCHOOL YEAR



Source: Kentucky Department of Education Kentucky Special Education Child Count Dashboard.

Figure 185 represents data from the KDE Special Education Child Count Dashboard and illustrates the percentages of students served by special education in JCPS across different types of disabilities. It compares rates of prevalence among multilingual learners determined eligible within each category with the prevalence of students who are not multilingual for the same disability category. During the 2023-24 school year, multilingual students were overrepresented in all categories except for Emotional/Behavioral Disability and Other Health Impairment. A review of data for prior school years revealed similar patterns.

While Kentucky's disability eligibility checklists include an item for school-based teams to attest that limited English proficiency is not a factor in the eligibility decision, school teams should be versed in language

learning stages when making student eligibility decisions.⁵⁸² JCPS provides eligibility determination guidance — which echoes KDE's guidance — that includes considerations for evaluating multilingual learners within each of the disability categories, emphasizing factors like results of standardized language development assessments, the length of time the student has been exposed to English, and the duration of English instruction received. The District also provides resources to support this work, such as Spanish versions of some norm-referenced tools used to evaluate academic, adaptive, communicative, cognitive, and social emotional functioning.⁵⁸³

Disabilities like Autism, Speech Language Impairment, and Developmental Delay emphasize impacts on the student's communication abilities as factors for eligibility. It is possible a multilingual learner may demonstrate patterns of communication challenge that appear similar to those present in these disability types. A student that is learning a second language and being considered for eligibility under the category of Specific Learning Disability may demonstrate challenges with literacy tasks, such as reading comprehension, fluency, or writing, due to their current English language proficiency — even in cases where the student's verbal communication ability in English is more developed. Challenges in reading and writing tasks may appear similar to the types of errors a student with a learning disability may make on similar literacy tasks. For these reasons, when data suggests a multilingual student is struggling to make appropriate progress, school districts must have well-developed tiered interventions to address student learning challenges and needs. Interventions at the Tier 2 or Tier 3 level to improve academic performance must be evidence-based and appropriately designed for students of the linguistic and cultural background who are participating in the intervention to facilitate the acquisition of the desired academic skills. Strong systems of intervention and collection of student progress data promote accurate referrals of multilingual students for special education evaluation. It is unclear to what extent ARCs for multilingual learners consistently include educational staff well-versed in the stages of second language acquisition or strategies for meeting the needs of multilingual learners. The District should consider these factors in ongoing staff training and recruitment efforts, especially as the District continues to serve greater numbers of multilingual learners.

During focus groups and interviews, JCPS staff provided information about the application of the District's Child Find, evaluation, and special education eligibility processes for students who are multilingual learners. Across focus groups, consistent themes emerged around an observed growth in the District's number of multilingual learners and a shift in the mindset of educators regarding the need for balancing special education and language development services for students who require both. It was noted that, in the past, many JCPS staff viewed special education as a higher priority than language development if a student was multilingual and had a disability. Staff described common practices used by IEP teams to engage families of multilingual learners, such as providing in-person, live interpreters during IEP meetings to support the family's engagement in the educational planning process for their child. It was also noted that in instances when a live interpreter is not available, District staff utilize the JCPS Language Line which provides a phone-based interpreter in the family's home language.

District staff in the ECE Department described collaboration efforts between the ECE Department and the Office of Multilingual Learners (OML) that provide families with community resources, as well as provide training to both District staff and families about best practices. ECE staff described the collaborative experience as positive and perceived the results as positive for families. When asked about the District's current guidance related to appropriate evaluation, identification, and IEP development, it was noted that the District does not currently provide written guidance specifically about practices for multilingual learners. However, it was noted that the District continues to explore new resources due to a growing number of multilingual students and families in the District.

⁵⁸² “[Guidance and Resources, Evaluation and Eligibility](https://www.education.ky.gov/specialed/excep/GuidanceResources/Pages/evalelig.aspx).” Kentucky Department of Education. Retrieved March 2, 2026. <https://www.education.ky.gov/specialed/excep/GuidanceResources/Pages/evalelig.aspx>.

⁵⁸³ “ECE Assessment Inventory Master List.” Jefferson County Public Schools. [Microsoft Excel].

Recommendations	
12.3.a	JCPS should examine current and historical evaluation reports and special education eligibility decisions to evaluate the degree to which ARCs across the District consistently and meaningfully consider language development when reviewing the presenting body of student performance data used to determine the presence of an educational disability.
12.3.b	Culturally and linguistically appropriate intervention/supplemental instruction practices should be implemented and documented at the Tier 2 and Tier 3 levels when referring a multilingual student for evaluation to determine special education eligibility.
12.3.c	The District should prioritize the active recruitment of multilingual evaluation staff to ensure evaluations of multilingual learners are conducted by personnel with appropriate linguistic and cultural expertise and can support evaluation teams in appropriately distinguishing language acquisition needs from disability-related factors.
12.4.a	JCPS should develop guidance for school-based teams outlining referral, evaluation, and eligibility determination considerations for multilingual learners suspected of having disabilities (e.g., assess student proficiency using the student's home language and English whenever feasible, use nonverbal assessments where appropriate, evaluate student performance with consideration to the stages of language acquisition, conduct peer comparisons against performance of culturally and linguistically similar peers) and provide ongoing training on this guidance.

Least Restrictive Environment and Continuum of Student Placements

The IDEA enshrines the right of each student with a disability to be educated alongside peers without disabilities to the maximum extent appropriate. According to federal law, students with disabilities can only be removed from the regular educational environment for placement in special classes or separate schools in circumstances when the student cannot be educated with non-disabled peers due to the nature and severity of their disability.⁵⁸⁴ This is the principle of Least Restrictive Environment (LRE). Kentucky regulations echo these requirements regarding the placement of students with disabilities in educational programs.⁵⁸⁵

JCPS provides written guidance to schools to support ARC teams when determining educational placement for students with disabilities based on the state and federal regulatory requirements as well as practices cited from academic research. Guidance provided by the District has been in place since December 2018 and was most recently updated in July 2022. The District's guidance articulates that a student's ARC must:

- Consider the general education classroom for every student.
- Consider possible modifications, aids, and services in the general education classroom.
- Consider a special education class or resource room for part of the day before considering a special class for the full day.
- Consider a more restrictive placement if appropriate based on the individual needs of the student.
- Document the reasons for any decision that results in students' services being delivered outside of the general education classroom.⁵⁸⁶

Finding	
12.5	JCPS is not meeting required state targets for Least Restrictive Environment (LRE) and the education of students with disabilities in general education settings.

⁵⁸⁴ 34 C.F.R. § 300.114(a)

⁵⁸⁵ 707 KAR 1:350

⁵⁸⁶ "Least Restrictive Environment (LRE) Guidance." Jefferson County Public Schools. 2022. Retrieved. [Microsoft Word].

JCPS guidance articulates a series of 13 guiding questions to support ARCs with student placement decisions such as:

- “Will the student receive an appropriate education with supplementary aids and services in the general education setting?”
- “Is the student making adequate progress and benefiting academically or socially from the general education placement? What does progress monitoring data indicate about the student’s academic and/or behavioral progress?”⁵⁸⁷

Although ARC meetings are not required to address all 13 questions when making LRE decisions for a student, the District’s guidance requires the team’s discussion to be documented in the conference summary of the student’s IEP.

The State Performance Plan (SPP) requires KDE to establish state targets related to the education of students with disabilities in their LRE. Each district, including JCPS, must report data to KDE annually related to LRE and performance is determined relative to the established state target. In 2023-24, KDE established a target for 75% of students with IEPs in each Kentucky district to be educated in the regular, general education classroom for at least 80% of the school day. JCPS has identified LRE as a strategic focus area as well as a component of their Goals and Guardrails. Guardrail 4.1 articulates the District’s intention to increase the percentage of students with disabilities receiving their education in the general education setting for at least 80% (or more) of the school day to 59.3% by June 2027.⁵⁸⁸

However, as shown in Figure 186, in 2023-24, JCPS educated about 56% of students with disabilities in general education environments for at least 80% of the school day, representing a gap of 19 percentage points from the state target of 75% and significantly below the rate of other larger school districts within Kentucky. JCPS also failed to meet the state’s LRE target for school years 2021-22 and 2022-23. Nonetheless, the rates of students with disabilities whose LRE is the general education classroom for most of the school day has increased by about one percentage point each year.

FIGURE 186: STUDENTS WITH IEPs SERVED IN GENERAL EDUCATION AT LEAST 80% OF THE SCHOOL DAY ACROSS LARGE SCHOOL DISTRICTS IN KENTUCKY

DISTRICT	2021-22	2022-23	2023-24
Boone County Schools	75.5%	75.3%	76.6%
Fayette County Public Schools	70.9%	70.4%	71.1%
Hardin County Schools	76.1%	78.1%	77.8%
Jefferson County Public Schools	53.6%	55.4%	56.2%

Source: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard.

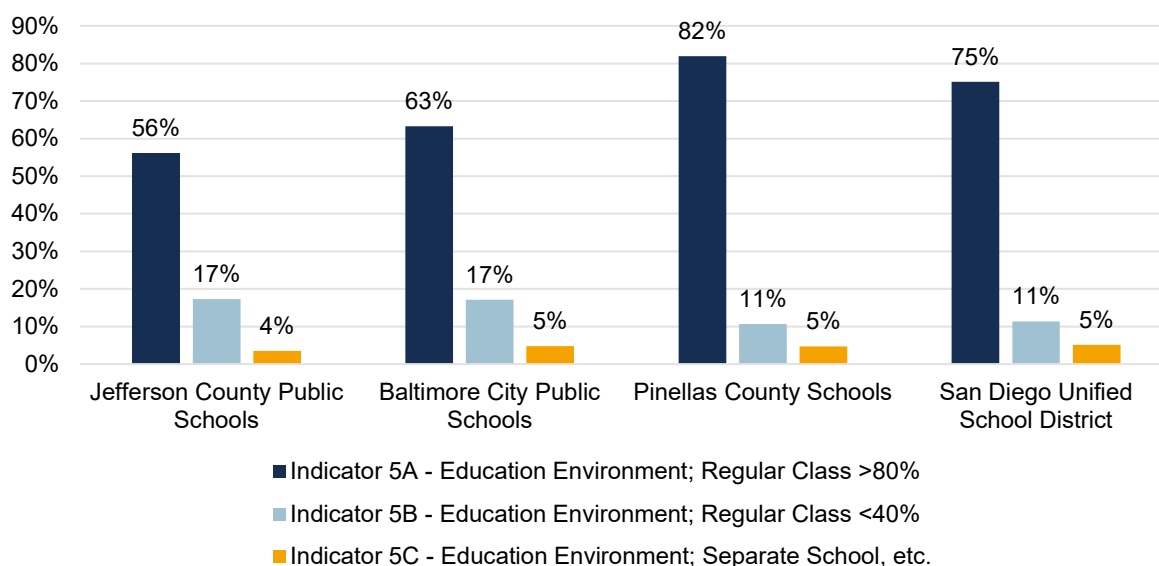
A March 18, 2025 report provided to JCBE included a progress update on Guardrail 4.1. At the time of this report to the Board, this Guardrail was noted as “off-track.” The report highlights that the percentage of students with IEPs served in general education settings at least 80% or more of the time has increased by approximately 2.6 percentage points from the 2021-22 school year to the 2023-24 school year. The District’s report based on December child count data for 2024-25 reflects a rate of 55.8%, with a goal to achieve 57.2% by May 2025. Notably, the report to the Board referenced data from elementary schools that

⁵⁸⁷ “Least Restrictive Environment (LRE) Guidance.” Jefferson County Public Schools. 2022. Retrieved. [Microsoft Word].

⁵⁸⁸ “Goals and Guardrails.” Jefferson County Public Schools. Retrieved December 16, 2025. <https://www.jefferson.kyschools.us/o/jcps/page/goals-and-guardrails>.

suggested a correlation between student achievement growth in reading and mathematics in schools with increased learning time in general education settings. Noted effective strategies included ongoing data collection, collaboration, and the intentionality of District training with an emphasis on co-teaching. The District identified next steps that described ensuring the ECE Department continues to provide professional development focused on co-teaching and high-leverage practices for serving learners with disabilities and to increase collaboration between ECE instructional coaches and academic instructional coaches to build educator capacity for supporting students with disabilities in core content classes.⁵⁸⁹

FIGURE 187: EDUCATIONAL ENVIRONMENTS (SPP INDICATOR 5) IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



Sources: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard; Maryland State Department of Education Public Website of State Performance Plan Results website; Florida Department of Education, Exceptional Student Education website; California Department of Education Annual Performance Report Measures.

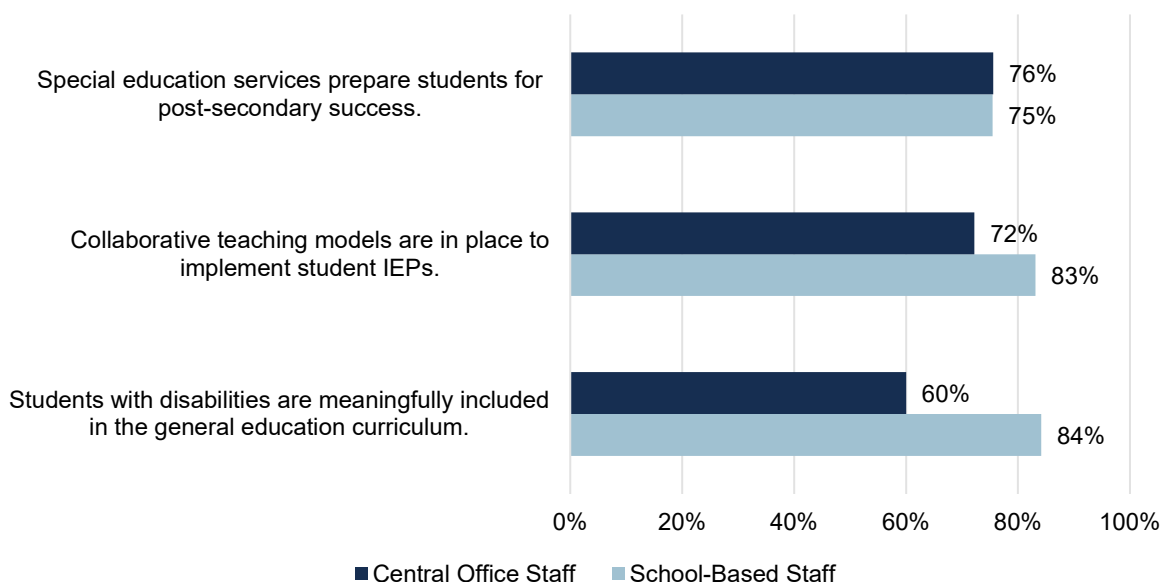
Comparison districts for which public data is available for 2023-24 indicated that two of the three similar districts educated at least 75% of students with disabilities in the general education setting for at least 80% or more of the school day. The third district, Baltimore City Public Schools, educated 63% of students with disabilities in regular classrooms for at least 80% of the day or more, a rate that is seven percentage points higher than that of JCPS. Overall, in comparison to other comparable districts, JCPS educates fewer students with disabilities in general education settings for most of the school day.

There are 13 state agencies that operate specialized educational programs within the boundaries of JCPS and employ staff that are overseen by the District. In addition to the state agency programs, JCPS operates four specialized schools for students with IEPs whose needs cannot be met through traditional District-operated schools. Site visits to three specialized schools during September 2025 revealed learning environments that incorporated assistive and general instructional technologies for students and teachers, visual communication supports, clear classroom procedures, proactive behavioral supports, and clean learning spaces that included areas for small group and individual instruction. In each setting, adult-to-student ratios were lower than traditional general education classrooms to account for student needs. Adult

⁵⁸⁹ "Interim Guardrail Monitoring Report: Guardrail 4 Protect Equitable Resourcing." Jefferson County Public Schools. Published March 2025. Retrieved December 16, 2025.
<https://www.jefferson.kyschools.us/documents/about/leadership-%26-organization/board-of-education/goals-and-guardrails/progress-monitoring-reports%E2%80%94goals-and-guardrails/goals-%26-guardrails---guardrail-4/16239395>.

staff were observed to work with students in groups and individually. Students were also observed to use resources available within classrooms to access learning activities.

FIGURE 188: STAFF PERCEPTIONS OF HOW THE DISTRICT IS SERVING STUDENTS WITH DISABILITIES



Source: Special Examination Survey.

The exam team collected survey data from school-based and Central Office staff regarding their perspectives on the inclusion of students with disabilities in general education settings, models used to deliver services in those settings, and the impact of special education services on outcomes for students.

As illustrated in Figure 188, most school-based staff agreed that students with disabilities are meaningfully included in the general education curriculum and that collaborative teaching models are in place to implement student IEPs.

- Notably, only 60% of Central Office staff indicated that students with disabilities are meaningfully included in the general education curriculum compared to 84% of school-based staff.
- About three quarters of Central Office staff expressed that collaborative teaching models are in place to implement student IEPs where over 80% of school-based staff expressed these models are in place.
- Both school-based and Central Office staff had similar perspectives on the effectiveness of the special education services provided to students with similar percentages from both groups expressing the services provided to students prepare them for post-secondary success.

The perception gaps around general education access and service models may be contributing to the District's challenges in meeting the state's established LRE targets due to discrepancies in common understandings regarding elements of collaborative teaching or inclusive service delivery.

Focus groups with JCPS staff indicated focused efforts to improve service delivery in the LRE for students with disabilities in general education settings. The ECE Department provides optional, cohort-based professional learning focused on teams of school-based administrators and educators around collaborative teaching models. The learning series began in the 2023-24 school year with 12 participating schools. The learning series is available on an ongoing basis to interested JCPS schools. Focus group participants provided examples of learning topics, such as developing master schedules and effective educator practices for co-delivering instruction and evaluating student progress. Co-delivered instruction, or co-teaching, is an approach to serving students with disabilities in general education classrooms where the

regular classroom teacher and a special education teacher collaboratively teach all learners. An example shared from the 2023-2024 cohort described a participating elementary school in which beginning-of-year assessment data reflected that students assigned to a co-taught second grade classroom were the lowest scoring out of students across three second grade classrooms in the school. By the end of the school year, it was noted that the students in the co-taught classroom outperformed students in the typically structured grade level classrooms on measures of academic achievement.

Recommendations	
12.5.a	JCPS should review student IEPs to examine why students are being removed from general education classrooms. The ECE Department, together with the Schools Division and Curriculum and Instruction Department, should use this information to inform the District's professional learning efforts to meet student needs through strong general education practices.
12.5.b	JCPS should review how well high-quality instructional materials are used within general education settings to support all students, including those with IEPs. New materials should include built-in learning supports that support the accessibility of materials for students with disabilities.
12.5.c	JCPS should ensure all educators receive foundational and ongoing training and support (i.e., coaching) regarding evidence-based instructional strategies and learning environment adaptations/structures that promote the access of students with disabilities within Tier 1 classrooms, as well as access to Tier 2 and Tier 3 intervention opportunities when needed.
12.5.d	JCPS should continue efforts to expand professional learning opportunities related to collaborative teaching and High-Leverage Practices to serve students with disabilities in less restrictive educational settings.
12.5.e	JCPS should continue ongoing efforts to ensure school teams receive timely guidance and training on making data-based decisions regarding LRE decisions for students served by special education.

State Determinations and Corrective Actions

KDE is required by IDEA to issue an annual determination of the special education program of each district within the state.⁵⁹⁰ The annual determinations are based on regulatory compliance and student performance measures. Districts obtain one of four possible determination levels:

- Meets Requirements
- Needs Assistance
- Needs Intervention
- Needs Substantial Intervention

Annual determinations for the District are summarized in Figure 189.

⁵⁹⁰ 34 C.F.R. §300.600(a)(2)

FIGURE 189: JEFFERSON COUNTY PUBLIC SCHOOLS ANNUAL SPECIAL EDUCATION PROGRAM DETERMINATION, 2020-2025

YEAR	Annual Determination
2020	Needs Intervention
2021	Needs Intervention
2022	Meets Requirements
2023	Needs Assistance
2024	Needs Assistance
2025	Needs Intervention

Source: Jefferson County Public Schools Special Education Program Information 7.31.

Annual determinations are made using the District's performance and compliance data associated with the SPP indicators for state and federal reporting. Factors contributing to the District's annual determination include graduation and drop-out rates for students with disabilities, suspension and expulsion of students with disabilities, disproportionate representation in special education and specific disability categories by race or ethnicity, compliance with timelines associated with determining student eligibility for special education, the percentage of early childhood students with IEPs in place on their third birthday, and the percentage of students age 16 and older who have compliant post-secondary transition plans within their IEP. Additional areas of noted concern for JCPS were participation rates in statewide reading and math assessments for 8th grade students with disabilities and level of math proficiency for 8th grade students with IEPs.

The exam team also reviewed records provided by JCPS regarding areas of state identified non-compliance within the District's special education program and any associated corrective action plans (CAPs) in place to address those areas of non-compliance. At the time of this report, JCPS had five CAPs. Areas where corrective actions were determined as needed were:

- Fiscal requirements (one CAP)
- Post-secondary transition services (two CAPs)
- Suspension and expulsion rates of students with disabilities (one CAP)
- Student specific noncompliance (one CAP)

JCPS records indicate the District's required actions are complete for four of the five CAPs. The remaining CAP is in progress at the time of this report.⁵⁹¹

Special Education Implementation

Special education implementation was examined through a multi-faceted analysis designed to capture both student outcomes and experiences. The exam team reviewed and incorporated academic performance and discipline data, dispute resolution data, data collected during school visits, as well as stakeholder perception data from parents, district staff, school staff, and students. Taken together, these sources provide a comprehensive view of how special education services are being delivered and experienced across the District.

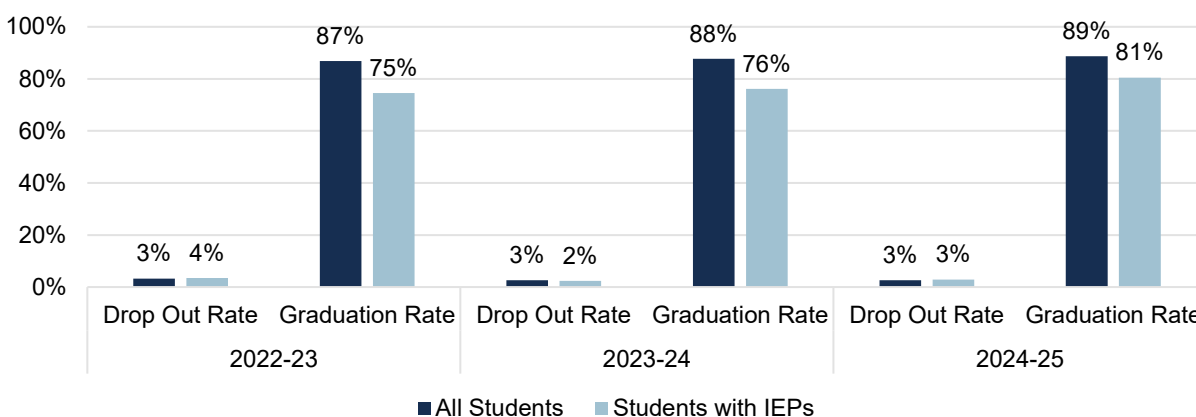
⁵⁹¹ "CAPs 10.24." Jefferson County Public Schools. [PDF].

The exam team conducted school visits in April and September 2025 and used a structured School Walkthrough Tool. Classroom visits reflected low levels of student engagement, superficial use of instructional materials, an emphasis on basic recall learning tasks, and limited evidence of embedded student accommodations or modifications. Detailed information and analysis regarding the exam team's school visits is located in **Chapter 7: Curriculum and Instruction**.

Graduation and Drop-Out Rates for Students with Disabilities

Data provided in the state report card regarding District four-year graduation cohorts and drop-out rates were reviewed across three consecutive school years to examine graduation and drop-out rates for students with disabilities in comparison to all students in the District. These data were analyzed with respect to State Performance Plan/Annual Performance Report (SPP/APR) requirements for special education. The SPP/APR includes federally required indicators of performance and compliance for all states and school districts. These indicators include graduation and drop-out rates as well as how well student IEPs address required planning for the student's transition from school to college or career after graduation.

FIGURE 190: JEFFERSON COUNTY PUBLIC SCHOOLS FOUR-YEAR GRADUATION RATE AND DROPOUT RATE FOR ALL STUDENTS AND STUDENTS WITH IEPs, 2022-23 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

Graduation rates for students with disabilities consistently lag behind the graduation rate for all JCPS students, though both groups show incremental improvement over time.

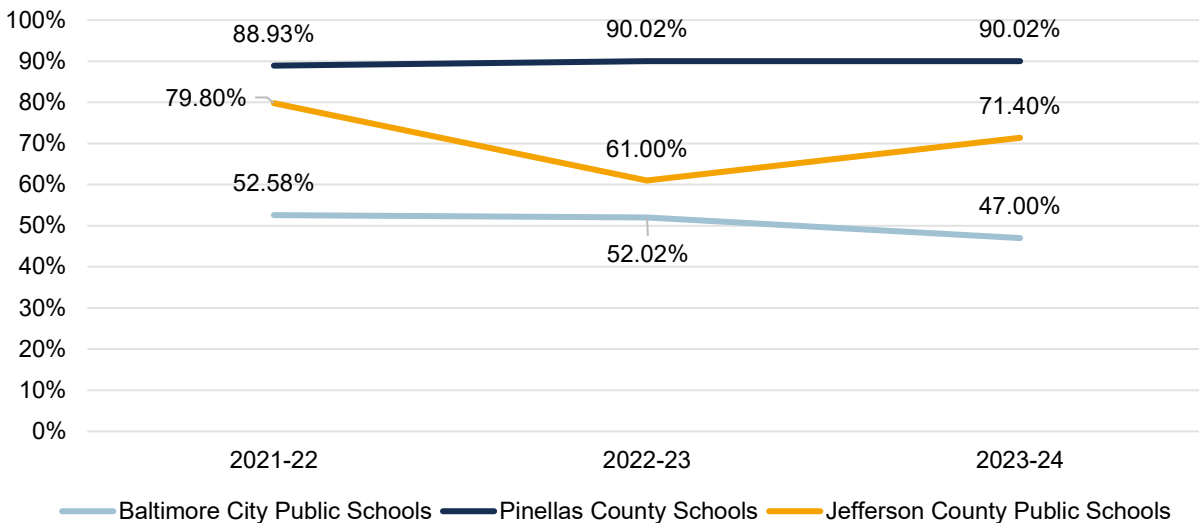
- In 2022–23, about 75% of students with IEPs graduated compared to 87% of all students, creating a 12-percentage point gap.
- By 2024–25, this gap narrowed slightly as graduation rates for students with disabilities increased to 81% while overall rates reached almost 89%, a four-percentage point decrease from the previous school year.
- Drop-out rates for students with IEPs also declined from 4% in 2022–23 to about 3% by 2024–25, mirroring the drop-out rate for all students in JCPS.

While the SPP/APR uses a methodology that includes all students with disabilities ages 14-21 who graduate high school with a regular diploma to report graduation rates rather than a four-year cohort model, a review of historical data in this area reflects that JCPS did not meet Kentucky's SPP/APR state targets for graduation rates of students served by special education in either 2023-24 or the previous two school years. JCPS met the state target for drop-out rates for students with disabilities in 2021-22 but has not met the target in the subsequent school years.

Comparative analysis of SPP/APR data reveals that graduation rates for Baltimore City Public Schools students with disabilities remained relatively stable during the same period with a slight decrease in 2023-

24⁵⁹² while graduation rates showed a moderate year-over-year increase in Pinellas County Schools from 89% in 2021-22 to 90% in 2023-24.⁵⁹³

FIGURE 191: GRADUATION RATE WITH A REGULAR DIPLOMA IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS FOR STUDENTS WITH DISABILITIES AGES 14-21, 2021-22 TO 2023-24 SCHOOL YEARS



Sources: Maryland State Department of Education State Performance Plan Results website; Kentucky Department of Education Kentucky Special Education Indicator Dashboard; Florida Department of Education Exceptional Student Education website.

Both comparison districts, Baltimore City Public Schools and Pinellas County Schools, demonstrated gaps in graduation rates between students with disabilities and all students in each district. In the 2023-24 school year, Pinellas County Schools had a 4.2% gap between all students and students with IEPs⁵⁹⁴ and Baltimore City Public Schools had a gap of 21.7%.⁵⁹⁵

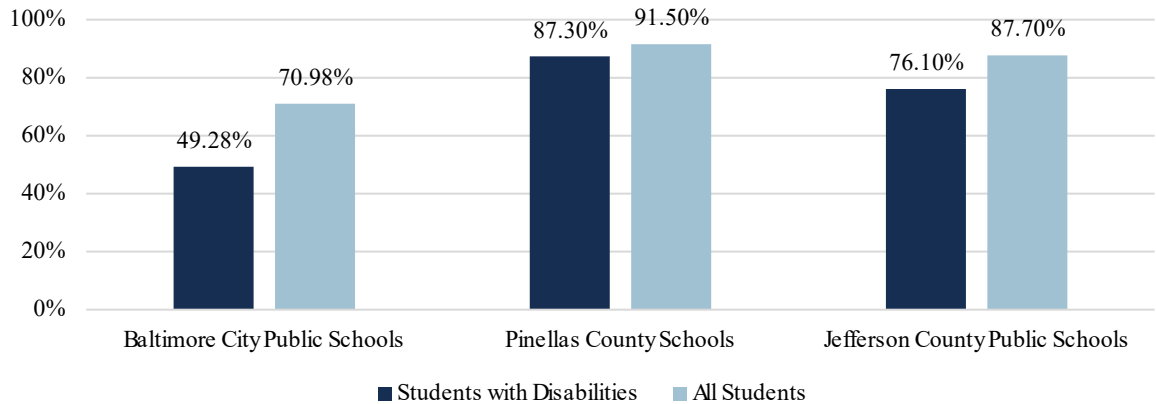
⁵⁹² "MSDE Public Website of State Performance Plan Results." Maryland State Department of Education. Retrieved July 7, 2025. https://mdideareport.org/special_main.aspx.

⁵⁹³ "Exceptional Student Education." Florida Department of Education. Retrieved July 7, 2025. <https://www.fldoe.org/academics/exceptional-student-edu/data>.

⁵⁹⁴ "Know Your Data Advanced Reports." Florida Department of Education. Retrieved March 3, 2026. <https://edudata.fldoe.org/AdvancedReports.html>.

⁵⁹⁵ "Maryland Public Schools Report Card." Maryland State Department of Education. Retrieved March 3, 2026. <https://reportcard.msde.maryland.gov>.

FIGURE 192: FOUR-YEAR GRADUATION RATE IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



Sources: Maryland State Department of Education Report Card; Kentucky Department of Education Report Card Dashboard; Florida Department of Education State Report Card.

State and federal law require ARCs for students with disabilities to begin planning for a student's post-secondary transition at age 14. SPP/APR data reveals that JCPS met state compliance requirements for post-secondary transition plan requirements as part of student IEPs in from 2021-2022 to 2023-24.⁵⁹⁶

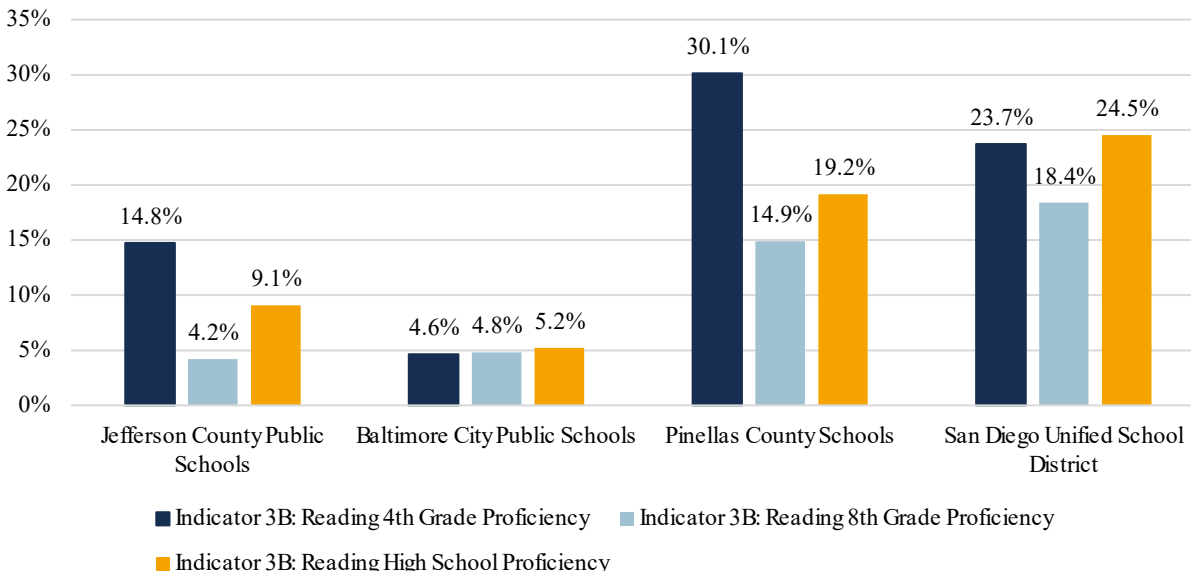
Students with Disabilities Reading Performance

This section presents an overview of the reading performance of students with disabilities in JCPS. It summarizes how student outcomes for students with disabilities in JCPS compare with other students with and without disabilities in the state as well as how performance compares to that of students with disabilities in comparable school districts on SPP indicators. Additional data and analysis regarding student Reading performance, as well as other academic content areas, is included in **Chapter 10: Assessments, Accountability, & Systems Improvement**.

Finding
12.6 Most students with disabilities in JCPS do not demonstrate grade-level reading proficiency.

⁵⁹⁶ “[KY Special Education Indicator Dashboard](https://kystats.ky.gov/Latest/SPEDIndicator).” Kentucky Center for Statistics. Retrieved July 3, 2025. <https://kystats.ky.gov/Latest/SPEDIndicator>.

FIGURE 193: READING PROFICIENCY FOR STUDENTS WITH DISABILITIES (SPP INDICATOR 3B) IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



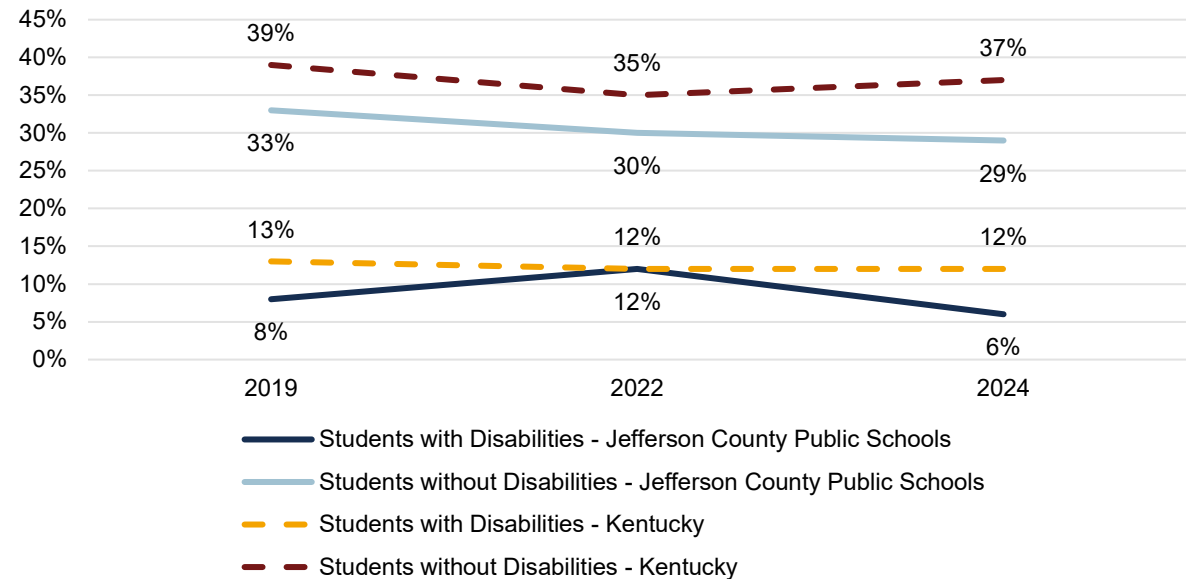
Sources: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard; Maryland State Department of Education State Performance Plan Results website; Florida Department of Education Exceptional Student Education website; California Department of Education Annual Performance Report Measures.

Note: Data for comparison districts were publicly available for the three districts shown in the figure, excluding Duval County Public Schools, Guilford County Schools, and Metropolitan Nashville Public Schools.

Reading proficiency outcomes for students with disabilities served by JCPS reveal persistent gaps across grade levels and in comparison to peer districts.

- At the elementary level, almost 15% of JCPS fourth grade students with IEPs achieve proficiency in reading, outperforming Baltimore City but underperforming Pinellas County and San Diego Unified.
- By eighth grade, JCPS experiences its sharpest decline, with proficiency dropping to only 4.2%, the lowest among the four districts.
- High school results show JCPS reading proficiency at 9.1% of students with disabilities meeting grade level expectations, which is higher than Baltimore City but still far behind Pinellas and San Diego.
- This pattern reflects a pronounced middle-grade challenge for JCPS, where students with disabilities lose ground in reading between elementary and middle school and continue to demonstrate limited proficiency in high school.

FIGURE 194: FOURTH GRADE READING NAEP PROFICIENCY BY DISABILITY STATUS FOR JEFFERSON COUNTY PUBLIC SCHOOLS AND KENTUCKY, 2019-2024



Source: The Nation’s Report Card.

National Assessment of Educational Progress (NAEP) trends further support these findings. Reading performance of JCPS students with IEPs has consistently lagged behind that of non-disabled students in the District across 2019, 2022, and 2024 4th grade NAEP reading assessment administrations. Between 2022 and 2024, students with disabilities in JCPS lost ground compared to 4th graders with disabilities in the state. When comparing the performance of JCPS students to Kentucky 4th graders overall, JCPS students both with and without disabilities overall perform below the state average. When comparing students with disabilities in JCPS to students with disabilities statewide, JCPS students performed six percentage points below the state average.

Recommendations	
12.6.a	JCPS should review how well existing reading materials are being consistently used across grade levels to ensure instruction is explicit, systematic, and accessible for students with disabilities and other student groups who may require extra support with grade-level learning.
12.6.b	The District should refine/develop tiered support systems by screening student reading skills several times a year and clearly defining criteria for providing and adjusting student interventions by using consistent progress monitoring tools.
12.6.c	JCPS should conduct a Districtwide examination of IEPs to evaluate rigor, instructional clarity, and alignment to grade-level literacy expectations. Use findings to provide targeted professional learning and coaching for special educators focused on developing standards-aligned IEPs with clearly defined, skill-specific reading goals (e.g., decoding, fluency, comprehension). Ensure IEP goals are aligned to the District’s literacy scope and sequence and explicitly connected to common progress-monitoring tools, strengthening instructional coherence and improving students’ access to the general education curriculum.

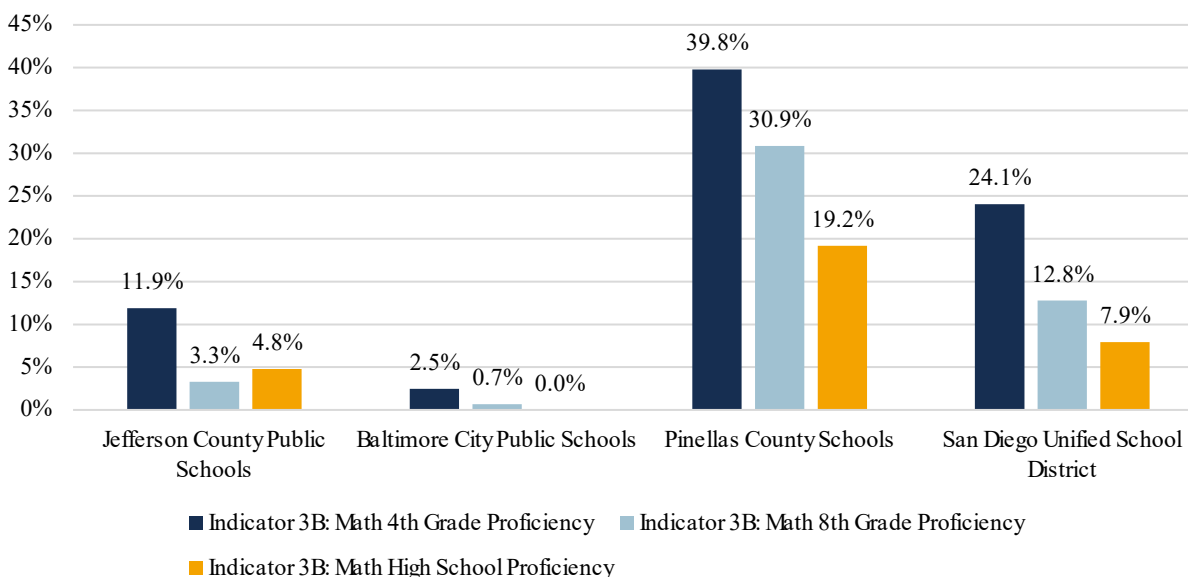
Students with Disabilities: Mathematics Performance

This section presents an overview of the mathematics performance of students with disabilities in JCPS. It summarizes how student outcomes for students with disabilities in JCPS compare with other students with and without disabilities in the state as well as how performance compares to that of students with disabilities in comparable school districts on SPP indicators. Additional data and analysis regarding student

mathematics performance, as well as other academic content areas, is in **Chapter 10: Assessments, Accountability, & Systems Improvement**.

Finding	
11.2	JCPS students with IEPs demonstrate limited grade-level mathematics proficiency. Rates of mathematics proficiency among students served by special education in JCPS lag behind those of two out of three comparable school districts.

FIGURE 195: MATHEMATICS PROFICIENCY FOR STUDENTS WITH DISABILITIES (SPP INDICATOR 3B) IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



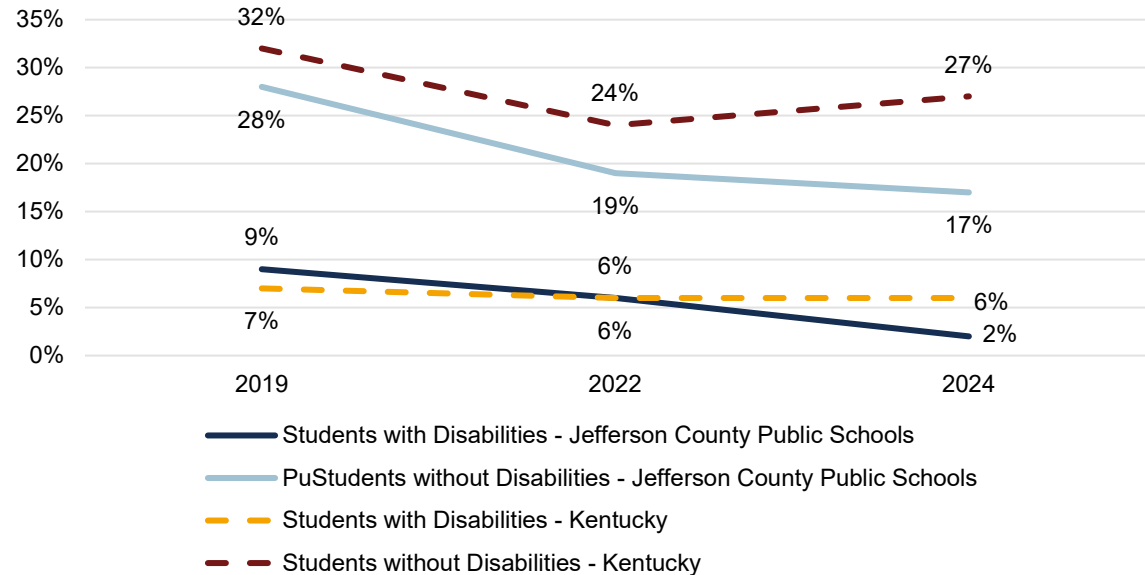
Sources: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard; Maryland State Department of Education State Performance Plan Results website; Florida Department of Education, Exceptional Student Education website; California Department of Education Annual Performance Report Measures.

Note: Data for comparison districts were publicly available for the three districts shown in the figure, excluding Duval County Public Schools, Guilford County Schools, and Metropolitan Nashville Public Schools.

A comparison of mathematics proficiency for students with IEPs across JCPS, Baltimore City, Pinellas County, and San Diego Unified for 4th grade, 8th grade, and high school students as reported in the 2023-24 SPP/APR shows consistently low performance by 8th grade students across districts.

- In 4th grade, JCPS demonstrated a 11.9% mathematics proficiency rate for students with disabilities, which is higher than Baltimore City but lower than San Diego Unified or Pinellas County.
- In 8th grade, mathematics proficiency declines sharply for all districts; JCPS falls to 3.3%, behind Pinellas and San Diego, but above Baltimore City.
- At the high school level, JCPS shows a modest increase to 4.8%. Pinellas and San Diego demonstrate higher proficiency rates, but no high school students with IEPs in Baltimore City were identified as proficient in mathematics.

FIGURE 196: EIGHTH GRADE MATHEMATICS NAEP PROFICIENCY BY DISABILITY STATUS FOR JEFFERSON COUNTY PUBLIC SCHOOLS AND KENTUCKY, 2019-2024



Source: The Nation’s Report Card.

NAEP performance data for 8th grade mathematics reveals that, across assessment administrations in 2019, 2022, and 2024, proficiency for students with disabilities in JCPS declined by seven percentage points. Over the same period, the 8th grade mathematics performance of non-disabled students in the District also decreased 11 percentage points. The statewide performance of non-disabled students declined in 2022 and improved in 2024. While the statewide performance rate of students with disabilities during this time remained flat, the performance of JCPS students with disabilities decreased. The performance of JCPS students with and without disabilities were below the state averages.

Recommendations	
12.7a	JCPS should review how well existing mathematics materials are being consistently used across grade levels to ensure instruction is explicit, systematic, and accessible for students with disabilities and other student groups who may require extra support with grade-level learning.
12.7b	The District should refine/develop tiered support systems by screening student mathematics skill development several times a year and clearly defining criteria for providing and adjusting student interventions by using consistent progress monitoring tools.
12.7.c	The District should provide targeted training and coaching for special educators to strengthen standards-aligned IEPs and mathematics goal development, with an emphasis on identifying and addressing critical prerequisite math skills. - Deliver targeted professional learning and coaching to educators in designing specially designed instruction that combines frequent cumulative review of previously learned concepts with systematic, explicit instruction to introduce and practice new math skills. - Prioritize foundational concepts (e.g., number sense, place value, etc.) in early grades and embed focused intervention in later grades to address persistent gaps in students’ mathematical understanding.

Discipline Practices and Students with Disabilities

This section examines disciplinary practices in JCPS as applied to students with disabilities who participate in the District's special education program. Consideration is given to the degree disciplinary practices in JCPS are consistent with state and federal requirements for schools to identify and implement positive behavioral interventions, strategies, and supports for students with disabilities who have disability-related behaviors that impede their learning or the learning of other students.⁵⁹⁷

Findings	
12.8	Students with disabilities in JCPS are more likely to experience the use of physical restraint or seclusion than non-disabled students.
12.9	Students with disabilities in JCPS are more likely to be involved in school disciplinary events than their non-disabled peers.

Analysis of District-provided disciplinary data regarding the use of physical restraint and seclusion each showed higher levels of involvement among students with disabilities than non-disabled students.

- During the 2023–24 school year, 72% of all restraint events involved a student with a disability, closely aligning with the 74% reported in 2022–23.⁵⁹⁸
- In the 2023-24 school year, 96% of all seclusion events involved a student with a disability. While this is slightly lower than the 99% reported in the 2022–23 school year, in both years for which data was reviewed, nearly all seclusion events involved students with disabilities.⁵⁹⁹

A comparison of physical restraint and seclusion data was conducted using the U.S. Department of Education, Office of Civil Rights 2020-21 Civil Rights Data Collection (CRDC).⁶⁰⁰

- 83% of physical restraints reported nationally across U.S. school districts involved an IDEA-eligible student.
- 75% of seclusion events reported nationally involved an IDEA-eligible student.
- In Kentucky, 78% of physical restraints reported by school districts involved an IDEA-eligible student.
- 78% of seclusion events reported by Kentucky school districts involved a student with a disability.

During the 2023–24 school year, students with disabilities were involved in a significant share of total disciplinary activity in JCPS. About 20% of all disciplinary events involved a student with a disability, reflecting a modest decrease from the 25% reported in the 2022–23 school year.^{601 602}

Data provided by JCPS indicates that the share of suspensions involving students served by special education remained relatively stable across the two school years. Out-of-school suspensions involved students with disabilities at a consistent rate across both years for which data was reviewed. In the 2023–24 school year, 29% of all out-of-school suspensions were associated with a student with a disability compared with 27% in the previous year.^{603 604}

Comparing the 2023-24 data provided by JCPS with the most current CRDC data suggests that JCPS is using physical restraint with students with disabilities at a lower rate than the national or state average.

⁵⁹⁷ 707 KAR 1:320; 34 C.F.R. §300.324(2)(i)

⁵⁹⁸ "C.25.1.schoolsafetydata2023." Jefferson County Public Schools. [Microsoft Excel].

⁵⁹⁹ Ibid.

⁶⁰⁰ "Civil Rights Data Collection 2020-2021." United States Department of Education, Office of Civil Rights. Retrieved March 2, 2026. <https://civilrightsdata.ed.gov>.

⁶⁰¹ "C.25.1.schoolsafetydata2024." Jefferson County Public Schools. [Microsoft Excel].

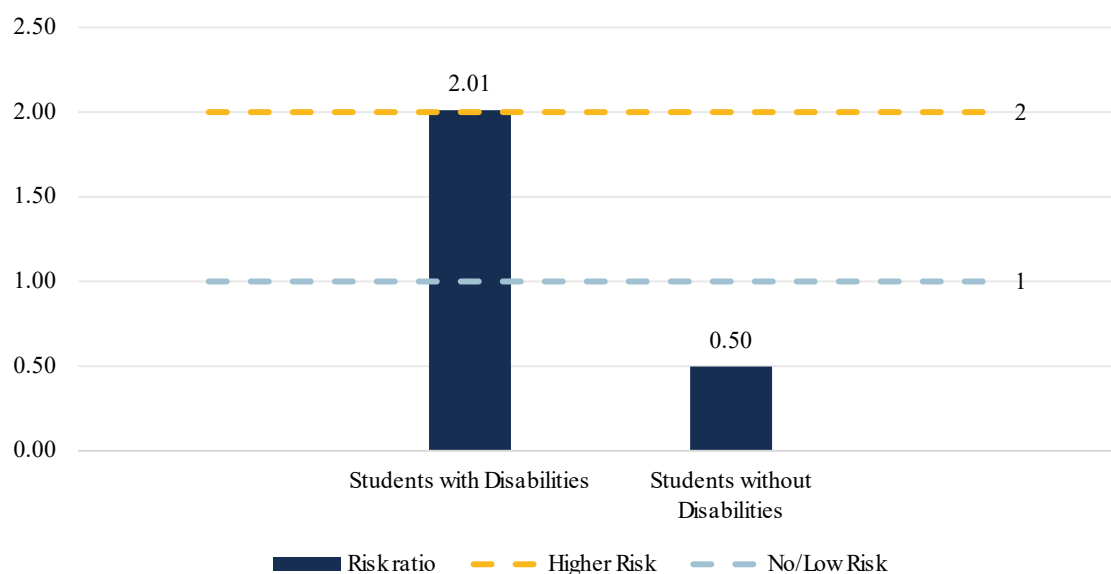
⁶⁰² "C.25.1.schoolsafetydata2023." Jefferson County Public Schools [Microsoft Excel].

⁶⁰³ "C.25.1.schoolsafetydata2024." Jefferson County Public Schools. [Microsoft Excel].

⁶⁰⁴ "C.25.1.schoolsafetydata2023." Jefferson County Public Schools. [Microsoft Excel].

However, JCPS's use of seclusion with students with disabilities exceeds both the national and state averages reported on the CRDC.

FIGURE 197: DISCIPLINE RISK RATIOS BY DISABILITY STATUS, 2024



Source: Data provided by Jefferson County Public Schools.

The exam team reviewed JCPS discipline data for the 2023-24 school year to assess the degree to which disciplinary practices are applied to both students with and without disabilities in the District. The exam team used the total number of disciplinary events to construct a risk ratio represented in Figure 197. The discipline risk ratio compares the likelihood that students with disabilities will experience a disciplinary event to the likelihood non-disabled students will experience a disciplinary event. The discipline risk ratio indicates that students with disabilities are more likely to be involved in disciplinary events, suggesting the District should examine the application of discipline practices with students with disabilities and verify school teams are implementing individualized behavior supports and data collection practices consistent with the IDEA. These supports include conducting Functional Behavior Assessments and using the results of such assessments to create Behavior Intervention Plans for students with ongoing disability-related behavior challenges.

JCPS has been identified by KDE as a district with significant disproportionality related to the District's disciplinary removals of Black students with disabilities. Federal law requires all states to collect and examine data to determine whether significant disproportionality is present in districts related to the identification of students with disabilities, educational placements of students with disabilities, or the incidence, duration, and type of disciplinary actions experienced by students with disabilities, including suspensions and expulsions.⁶⁰⁵ KDE uses a risk ratio of 3.0 as the threshold for determining whether disproportionality meets the threshold to be considered significant. Districts who are identified, under federal law, must set aside 15% of federal IDEA funds to provide Comprehensive Coordinated Early Intervening Services (CCEIS) to address the area of significant disproportionality.

Data provided by JCPS reflects longstanding challenges related to significant disproportionality and the discipline of Black students with disabilities. These data indicate the District's KDE calculated risk ratio has been over 3.0 dating back to the 2018-19 school year.⁶⁰⁶ JCPS has used CCEIS funds to implement action

⁶⁰⁵ ["IDEA Part B Regulations: Significant Disproportionality Essential Questions and Answers."](https://sites.ed.gov/idea/files/significant-disproportionality-qa-03-08-17.pdf) United States Department of Education. 2017. Retrieved November 3, 2025. <https://sites.ed.gov/idea/files/significant-disproportionality-qa-03-08-17.pdf>

⁶⁰⁶ "Dispro Progress Over Years." Jefferson County Public Schools. [Microsoft PowerPoint.]

plans to address this area of significant disproportionality through cross-functional efforts across an identified cohort of 24 schools. JCPS has a dedicated Central Office team overseeing the efforts and coordinating with campus principals, the Schools Division, and assistant superintendents. Federal funds are used to provide support staff to schools, such as board-certified behavior analysts (BCBAs), school psychologists, and interventionists; focused professional learning on topics like trauma-informed practices; student engagement strategies; and evidence-based interventions.

A review of previous year's CCEIS action plans reflect progress toward established goals. During focus groups and interviews, JCPS staff expressed confidence that the District will satisfy KDE's requirements by the end of the school year. In the event that the District is no longer mandated to set aside funds to address significant disproportionality, JCPS staff shared that the District anticipates voluntarily reserving IDEA funds to sustain efforts to improve disciplinary practices.

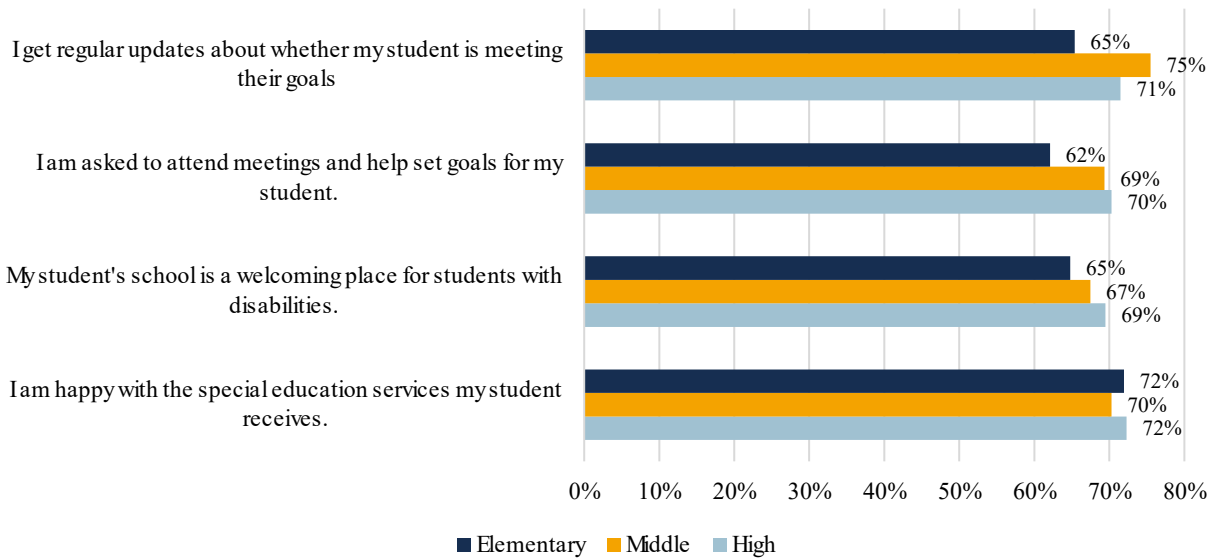
Recommendations	
12.8.a	JCPS should verify discipline, restraint, and seclusion policies are aligned with IDEA requirements for the use of positive behavioral interventions for students with behavioral needs and ensure schools are fully aware of these requirements.
12.8.b	The District should expand implementation of evidence-based frameworks at the Tier 1 level such as Positive Behavioral Interventions and Supports (PBIS) and ensure that Behavior Intervention Plans (BIPs) for students with disabilities are consistently implemented and monitored.
12.8.c	The District's ECE Department, in partnership with the Department of Culture and Climate, should provide ongoing professional development and training for administrators, educators, and support staff on understanding disability-related behaviors and aligned evidence-based practices to support student needs related to such behaviors.
12.9.a	JCPS should conduct quarterly reviews of disciplinary data, including uses of restraint and seclusion, disaggregated by disability status, school, and staff involvement to identify patterns and themes and follow up with schools to ensure that Functional Behavioral Assessments (FBAs) are conducted and BIPs are developed, implemented, or updated where discipline data suggests current levels of support are not sufficient.
12.9.b	The District should explore opportunities to strengthen family partnerships with school-based teams regarding proactive behavioral planning for students with IEPs; prioritizing individualized, proactive strategies rather than reactive disciplinary responses to address challenging student behaviors related to identified disabilities.

Perceptions of Families, Students and Staff

Federal and state laws provide multiple methods for families to address challenges related to special education through formal processes. These formal processes are known as dispute resolution options. To evaluate the extent to which policies and procedures translate into actionable practice for the delivery of special education and related services to eligible students, the exam team reviewed dispute resolution data collected from JCPS. Dispute resolution pathways include state complaints filed with KDE, due process hearing requests, or civil rights complaints which are investigated by the federal Office of Civil Rights in cases where disability-based discrimination is alleged.

Data for all three types of dispute resolution activities was reviewed for the 2022-2023, 2023-2024 and 2024-2025 school years. Over the three school years, there were seven state complaints, five due process requests, and five civil rights complaints. In addition to dispute resolution data, the exam team collected and analyzed perception data from surveys conducted with school-based staff, Central Office staff, JCPS families of children with IEPs, and students with IEPs themselves.

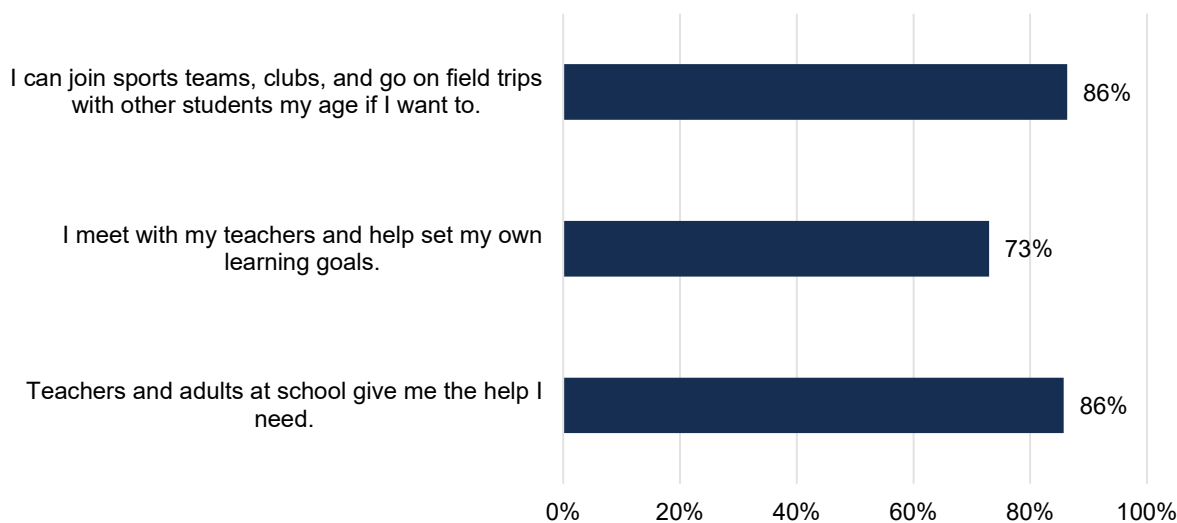
FIGURE 198: FAMILIES OF STUDENTS WITH IEPs PERCEPTIONS OF JEFFERSON COUNTY PUBLIC SCHOOLS SPECIAL EDUCATION SERVICES



Source: Special Examination Survey.

Most families across elementary, middle, and high school who participated in the exam team's survey expressed satisfaction with the special education services the District provides their child. Family perceptions of the school environment as a welcoming place for students with disabilities and of family partnership both increase incrementally from elementary to high school, with families of high school students expressing the strongest positive perceptions related to both items. Families of middle school students served by special education in JCPS were more likely to express receiving regular progress monitoring updates about their child's goals than families with students in elementary or high school, with families of elementary age students expressing the lowest level of agreement in this area.

FIGURE 199: STUDENTS WITH IEPs PERCEPTIONS OF SUPPORT FROM TEACHERS AND ACCESSIBILITY OF CLUBS AND ACTIVITIES



Source: Special Examination Survey.

A key component of IDEA focuses on ensuring students have meaningful access to the general education curriculum as well as access to non-academic and extracurricular activities. As part of the exam team's data collection activities, a survey was administered to middle and high school students with IEPs to gather information about their experiences in JCPS. Over 80% of students with IEPs who completed the survey agreed that they can join sports teams, clubs, and attend field trips with other students their age if they choose to do so. About three-quarters of students indicated they meet with their teachers and help set their own goals for learning, and almost 90% of students with IEPs agreed that the teachers and adults at their school provide them with the help they need.

GIFTED & TALENTED

704 KAR 3:285 establishes state regulations for gifted and talented identification and programming in school districts. These regulations set out the policies and procedures for gifted and talented programs that a district must have in place and describe the requirements for appropriate identification of a student for gifted and talented services, determination of eligibility, service delivery options, and ongoing program evaluation requirements. Additionally, these regulations outline considerations for curriculum and differentiation of instruction for gifted students, procedural safeguard requirements for families, personnel requirements for teachers working directly with gifted students, budget, and funding stipulations related to gifted and talented programs.

In JCPS, gifted and talented programming is provided to eligible students in grades 4-12 following a formal identification process consistent with that described in 704 KAR 3:285. In 2023-2024, the District served 10,627 grade 4-12 gifted and talented students. Upon formal identification, an eligible student is provided with a Gifted Student Service Plan (GSSP) that outlines the ways in which the student's learning will be extended beyond the standard curriculum as well as flexible grouping and differentiated learning experiences aligned to the student's interests, needs, and abilities.

Students in Kindergarten through grade three are not formally identified for gifted and talented services. However, students in early grades who demonstrate exceptional aptitude or the potential ability to perform at exceptionally high levels, are identified for the Early Talent Pool. In the 2023-24 school year, JCPS served 3,209 K-3 students in the Early Talent Pool. A minimum of three informal assessment measures must be used to demonstrate evidence of a student's identification for the Early Talent Pool. Once identified,

students in the Early Talent Pool are provided with enrichment services. A formal GSSP, however, is not provided until the student reaches the fourth grade.⁶⁰⁷

Gifted and Talented Identification Practices and Procedures

This section examines the procedures and practices used by JCPS to identify gifted and talented learners in the District. The exam team's review of the District procedures and practices in this area includes examination of the consistency of gifted and talented identification across student sub-groups.

Finding	
12.10	African American students, Hispanic students, and English Learners are represented at lower rates in JCPS gifted and talented programs while white students and Asian students are represented at higher rates when compared to overall district enrollment.

A school-based gifted and talented placement committee is responsible for the identification of a student as a gifted learner. JCPS guidance clarifies this committee is to include the school principal or principal's designee, the school-level gifted and talented lead or teacher, regular classroom teacher(s) of the student and special services professionals based on the student's needs, such as special education teachers, English language development teachers, counselors, or other professionals. Students may be considered for gifted and talented eligibility on a rolling basis based on recommendations from school staff or the student's parent/guardian. The consent of the student's parent/guardian is needed prior to the administration of a formal assessment. If the student is determined to be eligible for gifted and talented services, the student's parent/guardian is notified and provided with a GSSP. The GSSP is updated and provided to the parent/guardian at least annually thereafter and progress reports on the GSSP are provided at least twice per year.

Additionally, JCPS's gifted and talented District policy stipulates that determination of eligibility for gifted and talented services be based on the student's individual needs, interests, and abilities and be designed to address environmental and cultural factors that may contribute to the student being overlooked, such as whether the student is economically disadvantaged, underachieving, struggling to maintain appropriate behavior, a member of a racial or ethnic minority, identified as having a disability, or a multilingual learner.⁶⁰⁸ Figure 200 below outlines each area of gifted and talented identification and associated identification requirements.

FIGURE 200: AREAS OF GIFTED AND TALENTED IDENTIFICATION FOR STUDENTS IN GRADES 4-12

AREA	Description	Identification Requirement
General Intellect	Demonstrated ability or potential to perform at an exceptionally high level in abstract or logical reasoning, memory, analysis, synthesis, or evaluation of information.	Student must score at the 9 th stanine or at least the 96 th percentile on a comprehensive test of intellectual ability in addition to at least two pieces of supporting evidence.
Specific Academic Aptitude	Demonstrated ability or potential to perform at an exceptionally high level in one or more academic areas including math, reading, science, or social studies that is significantly	Students must score at the 9 th stanine or at least the 96 th percentile on the Measures of Academic Progress (MAP) or other standardized, norm-referenced achievement test in addition to at least two pieces of supporting evidence.

⁶⁰⁷ "Primary Talent Pool: Frequently Asked Questions." Kentucky Council for Gifted and Talented Education. Retrieved August 26, 2025. <https://drive.google.com/file/d/1EmNtCIU0FeJC4q5J4GzQemSkPleOD11E/view>.

⁶⁰⁸ Gifted and Talented Students and Primary Talent Pool Students. Curriculum and Instruction 08.132. Jefferson County Public Schools. [PDF]

beyond the age, experience, or environment of same age peers.		
Creativity	Ability or potential to perform at an exceptionally high level in creative thinking and divergent approaches to conventional tasks through creative reasoning, advanced insight and imagination, and unique problem-solving approaches.	Student performance on universal screeners of fluency, flexibility, originality, and elaboration in addition to two pieces of supporting evidence.
Leadership	Demonstrated potential to take on leadership roles or lead others that may manifest in both positive or negative ways.	Students must demonstrate willingness to assume leadership roles in class, student organization, and community activity. Schools may use universal screeners such as peer nomination to identify potential candidates in this area. Two supporting pieces of evidence are also needed.
Visual/Performing Arts	Demonstrated ability or potential to achieve at exceptionally high levels in visual or performing arts and demonstrates potential for outstanding production, accomplishment, or creativity in visual arts, dance, music, or drama.	Audition or letter of recommendation or product/portfolio assessment conducted by a specialist or professional artist in addition to two pieces of supporting evidence.

Source: Jefferson County Public Schools 5 Gifted Areas At-A-Glance.

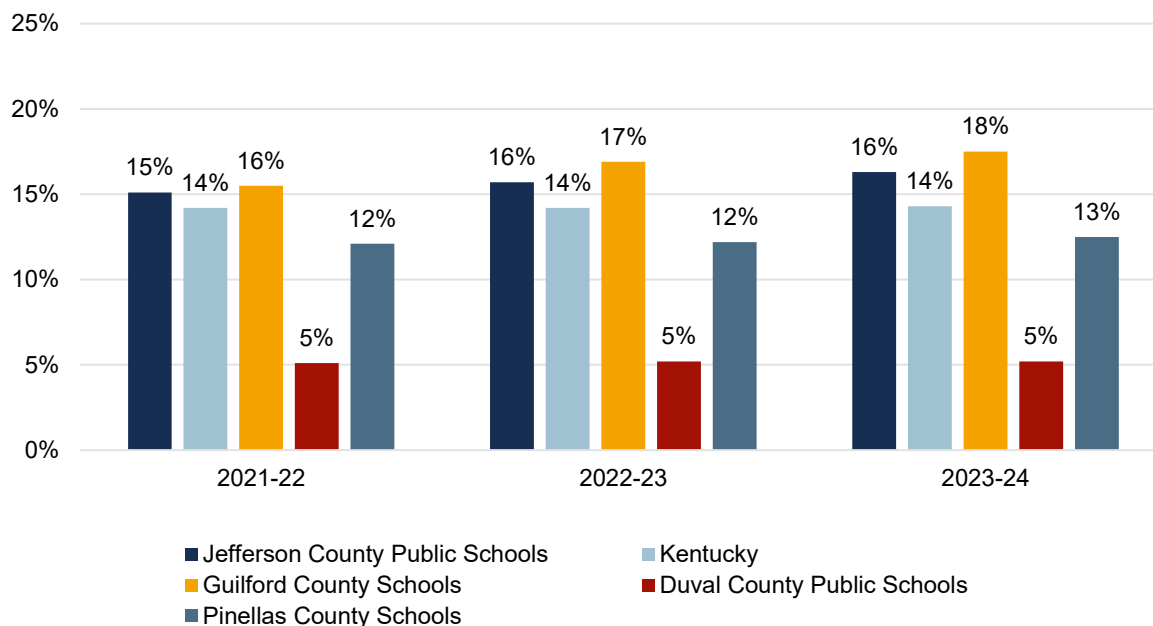
Special considerations are noted in JCPS's gifted and talented identification procedures for students who are members of special populations groups, such as students who are multilingual, qualify for free or reduced lunch, or have a disability. These special considerations were noted as a recent development by JCPS staff during interviews and focus groups with the exam team. Specifically, it was noted that over the past five years, JCPS has implemented the use of local norms and provided increased District support to school teams with data reviews to support the identification of gifted learners. Staff also highlighted the use of an equity index to review gifted identification across demographic groups to monitor equitable representation within the District's gifted and talented program. It was noted that the appropriate identification of multilingual students as gifted in one or more areas represents an ongoing challenge and area of growth for JCPS.

The District's guidance describes that special considerations for the application of the norm-referenced test may be applied for specific groups of students, such as students with a general intellectual ability or specific academic aptitude, identified as minorities, in need of English as a Second Language (ESL) services or an English Language Learner (ELL), and/or qualify for free or reduced lunch. These considerations let the school look at areas where a student scores very high (top 10%) without considering scores that are lower than average when deciding if the student qualifies for gifted services.⁶⁰⁹

The exam team reviewed JCPS's gifted and talented enrollment with that of identified peer districts as well as Kentucky statewide enrollment data. Figure 201 reflects this comparison.

⁶⁰⁹ Evidence for Gifted and Talented Identification. Jefferson County Public Schools. [PDF]

FIGURE 201: GIFTED AND TALENTED STUDENT ENROLLMENT ACROSS JEFFERSON COUNTY PUBLIC SCHOOLS, PEER DISTRICTS, AND KENTUCKY, 2021-22 TO 2023-24 SCHOOL YEARS



Sources: Kentucky Department of Education Report Card Dashboard; North Carolina Department of Public Instruction AIG Student Data; Florida Department of Education Know Your Schools.

Gifted and talented learners represent about 14% of statewide public school enrollment in Kentucky, a relatively stable figure when reviewing data across the most recent three school years. Over the same period, gifted and talented enrollment in JCPS has increased incrementally from roughly 15% in the 2021-22 school year to just over 16% in the 2023-24 school year. When reviewing gifted and talented as a percentage of overall student enrollment between JCPS and three comparison districts, gifted and talented students represent a smaller percentage of overall student enrollment in two of the three comparison districts compared to JCPS, with Guilford County Schools showing a slightly higher proportion of gifted and talented students compared to the District. Publicly available data for San Diego Unified School District posted on the district's website indicates gifted students represent 22% of the districts overall enrollment,⁶¹⁰ a rate higher than JCPS. Overall, while gifted and talented enrollment in JCPS is slightly higher than the statewide rate in Kentucky, it is generally comparable to that of other school districts serving similar populations of students.

A review of gifted and talented student identification data across demographic groups between the 2021-22 and 2023-24 school years reveals that male and female students are identified as gifted learners somewhat evenly across school years for which data were reviewed.⁶¹¹ Additionally, for each year of data reviewed, economically disadvantaged students represented about 64% of JCPS's total District enrollment. However, only 46% of JCPS students identified as gifted were economically disadvantaged students.⁶¹² Figure 202 represents how student sub-groups in the District are represented in gifted and talented programming in the 2023-24 school year. The exam team also reviewed historical data for the 2021-22 and

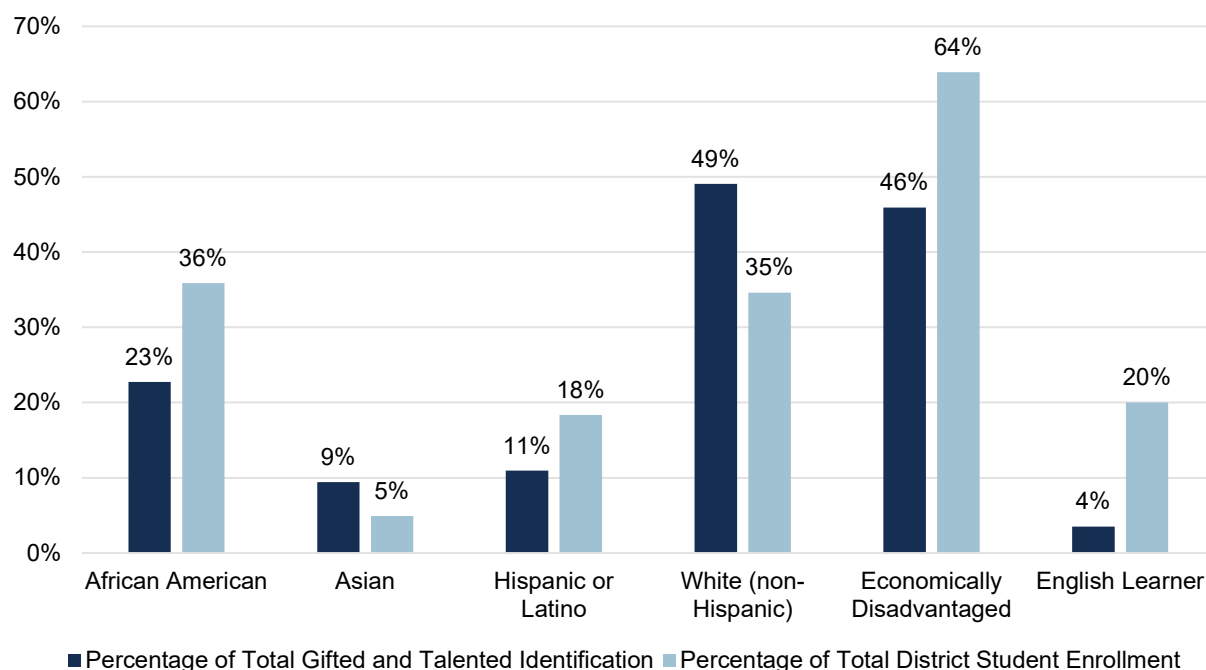
⁶¹⁰ "San Diego Unified School District Fast Facts Guide." San Diego Unified School District. Retrieved November 25, 2025. https://cdnsm5-ss18.sharpschool.com/UserFiles/Servers/Server_27732394/File/About/Overview%20and%20History/About%20Us/FastFacts_6x9_Final.pdf.

⁶¹¹ "Kentucky School Report Card Suite Dashboards." Kentucky Department of Education. Retrieved November 26, 2025. <https://reportcard.kyschools.us/home>.

⁶¹² Ibid.

2022-23 school years, which demonstrated comparable levels of student representation shown in Figure 202.

FIGURE 202: PERCENTAGE OF TOTAL JEFFERSON COUNTY PUBLIC SCHOOLS GIFTED AND TALENTED IDENTIFICATION BY STUDENT GROUP, 2023-24 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

- Asian students are represented in the JCPS gifted and talented programs at rates higher than their proportion in the District's overall student population.
- Hispanic/Latino students are represented in JCPS gifted and talented programs at a lower rate than their proportion of total enrollment in the District.
- African American students make up approximately 36% of the District's total enrollment. However, roughly 23% of the gifted and talented population is African American.
- White students represent roughly half of the District's gifted and talented students, despite comprising only 35% of JCPS's total student enrollment.⁶¹³

Gifted and talented equity index data from the 2024-25 school year further supports publicly available data regarding student identification. The equity index is used to track student identification for gifted and talented programming at the beginning, middle, and end of the school year for each JCPS school. District aggregate data reflects relatively stable overrepresentation of white and Asian students and underrepresentation of African American students and Hispanic students.

A review of the District's equity index reflects pockets of success in addressing disproportionate identification. For example, most Zone 1 schools were within expected representation limits for students who qualify for Free and Reduced Lunch by the end of the school year. Additionally, 50% of Zone 3 schools fell within limits for the identification of White students at the end-of-year benchmark and about 63% of elementary schools within the Accelerated Improvement Schools (AIS) Zone fell within limits for identification of Black students at the end-of-year benchmark.⁶¹⁴

⁶¹³ "Kentucky School Report Card Suite Dashboards." Kentucky Department of Education. Retrieved November 26, 2025. <https://reportcard.kyschools.us/home>.

⁶¹⁴ "24-25 Equity Index Analysis (GT & PTP) _12.12." Jefferson County Public Schools. [Microsoft Excel].

Recommendations	
12.10.a	The District should continue to monitor disproportionate identification practices across gifted and talented programs.
12.10.b	JCPS should develop research-based guidance for appropriate identification of multilingual learners as gifted and talented. Guidance should be developed in partnership between the ECE Department and the Office of Multilingual Learners with a focus on supporting monolingual educators in identifying indicators of potential giftedness in students who are developing second language proficiency.
12.10.c	JCPS should include information about characteristics of gifted learners provided in multiple languages to parents/families and take steps to ensure multilingual or non-English speaking families are aware of recommendation and identification practices for the District's gifted and talented program.

Gifted and Talented Service Models

JCPS provides a variety of options for service delivery to students identified as gifted and talented. District guidance outlines multiple service delivery options for gifted and talented students of all grade levels. Service delivery options include allowing a student to skip a grade due to performance, participate in higher grade-level coursework for specific subject areas, or exit high school earlier than expected. Students may also participate in academic competitions or extracurricular activities that are provided consistently throughout the school year, engage in differentiated learning experiences within their regular education classrooms, engage in independent learning or individual studies, or be provided with enrichment opportunities during the school day. Additionally, students may be “cluster grouped” in which four or more students identified as gifted are placed within the same classroom with a teacher who is trained in instructional methods for gifted and talented learners. Special counseling services are also available in which a school counselor may provide small group services to several students focused on a specific area related to the social and emotional needs of gifted learners.

Although the District's published materials reference self-contained options for gifted and talented students as an option for service delivery, JCPS does not currently operate self-contained classrooms specifically for gifted and talented learners. This means that gifted and talented learners are not placed in separate, full-time classes exclusively with other gifted learners. The District primarily relies on inclusive classroom settings where gifted and talented students learn in the same environments as general education peers. During interviews and focus groups, JCPS staff reported the most common instructional approach used to support gifted students in general education settings is through differentiated instruction. In this model, classroom teachers adjust the level, complexity, or pace of lessons to meet individual students' learning needs. For gifted learners, differentiation may include more advanced materials, extension tasks, or opportunities for independent exploration.

The District also employs traveling gifted and talented teachers who move between schools. These teachers support gifted students through pull-out services, where students leave the general classroom for short periods of the day to receive enrichment or advanced instruction provided directly by the gifted and talented teacher. Traveling teaching staff may also provide materials, coaching, or guidance to the regular classroom teachers of gifted learners to help them extend learning opportunities within the regular school day.

Additionally, students who are identified as gifted and talented based on general intellectual ability or specific academic aptitude may participate in the JCPS Advance Program for high-achieving learners.⁶¹⁵ The JCPS Advance Program provides academically advanced coursework for high-achieving students in grades 4–12. Although not limited to students formally identified as gifted, gifted learners may participate.

⁶¹⁵ Gifted and Talented Students and Primary Talent Pool Students. Curriculum and Instruction 08.132. Jefferson County Public Schools. [PDF]

The program is available Districtwide except for traditional schools. Admission is based on MAP scores at or above the 77th percentile, Kentucky Summative Assessments (KSA) results, student GPA, and a review of a high-achievers' checklist. JCPS also maintains a parent-facing Google Site with program information and staff contacts.⁶¹⁶ Middle and high school students, including gifted and talented learners, may access options such as dual-enrollment classes, dual-credit courses, and participation in Advanced Placement and honors courses. Mentorships in which the student participates in specialized study with an adult mentor in the community, seminars that use discussion-based forums on advanced content and focus on higher-level thinking skills, and participation in magnet school programs are also options available for secondary level gifted students. Although authorized under 704 KAR 3.285, JCPS does not currently offer distance learning, video, or online instruction as service delivery models for gifted learners.

EARLY CHILDHOOD

KRS 157.3175 establishes the requirements and eligibility for the state's preschool program, and administrative regulation 704 KAR 3:410 describes enrollment requirements, programmatic goals, learning environment stipulations, and personnel requirements for preschool programs. Preschool education is available to children ages three and four with disabilities and four-year-old children considered "at-risk" due to income eligibility requirements. Statewide goals for the preschool program include the provision of developmentally appropriate experiences to promote the child's cognitive, communicative, social, physical, emotion, and creative development.⁶¹⁷

In JCPS, Early Childhood Programs fall within the purview of the ECE Department. An Executive Director of Early Childhood Education serves as a direct report to the Chief of Exceptional Child Education and supervises one Director of Early Childhood Education, a secretary, Manager of Early Childhood Community Education/Community Relations, and a Budget and Management Operations Specialist at the Central Office level. The Executive Director also serves as the direct supervisor for the principals at the District's four early childhood centers and the District's six split-centers. Early Childhood is not a compulsory program and is not available at all JCPS school sites. Under the organizational changes proposed by JCPS in March 2026, Early Childhood would continue to operate within the purview of the ECE Department with the Executive Director of Early Childhood reporting to the newly created Executive Officer of ECE role.

In the 2023-24 school year, there were 33 public preschool programs available in JCPS. Kentucky requires that all early childhood programs receiving state or federal financial assistance participate in State's All STARS quality rating system. Ratings are scored on a scale of one to five, with one being the lowest quality rating and five being the highest quality rating. Ratings consider factors related to staff qualifications and certifications, instructional quality, family and community engagement, and administrative and leadership practices.⁶¹⁸

- Most JCPS public preschools received an All STARS rating of five (24 out of 33 programs).
- Of JCPS preschool programs that did not receive the highest All STARS rating, three programs were rated at a quality level of four and three programs were rated at a quality level of three.
- Ratings data were unavailable for the remaining three JCPS programs.⁶¹⁹

Preschool Programming and Practices

The JCPS Early Childhood web page provides an overview of the preschool application process. This overview outlines the online application and telephone number to support families who cannot apply online, as well as the eligibility requirements in bulleted language, including proof of incomes, residence, child's

⁶¹⁶ "[JCPS Advance Program](https://sites.google.com/jefferson.kyschools.us/jcps-advance-program)." Jefferson County Public Schools. Retrieved August 26, 2025.
<https://sites.google.com/jefferson.kyschools.us/jcps-advance-program>.

⁶¹⁷ 704 KAR 3:410

⁶¹⁸ "[Kentucky All STARS Family Information](https://www.chfs.ky.gov/agencies/dccbs/dcc/Pages/kyallstars.aspx)." Kentucky Cabinet for Health and Family Services. Retrieved December 18, 2025. <https://www.chfs.ky.gov/agencies/dccbs/dcc/Pages/kyallstars.aspx>.

⁶¹⁹ "[KY Stats Early Childhood Profile](https://kystats.ky.gov/Latest/ECP)." Kentucky Center for Statistics. Retrieved December 18, 2025.
<https://kystats.ky.gov/Latest/ECP>.

age and birth, and other necessary documentation needed to enroll a child in the District's program. For each category, the web page identifies examples of the types of documents that demonstrate eligibility as well as non-examples of documentation that cannot be accepted for each respective category.⁶²⁰ The Early Childhood website may also be translated and accessed in a number of languages to enhance accessibility for multilingual families.

Families and children who do not meet income-level requirements for JCPS preschool programs were discussed during interviews with JCPS Early Childhood staff. When a family does not meet the eligibility requirement due to the child's IEP status or family income, the family is referred to Thrive by 5 Louisville. Thrive by 5 is a non-profit organization that provides no cost support services to families to identify financial assistance opportunities, locate childcare providers, and assist with application processes.⁶²¹

Students who participate in JCPS preschool programs are provided instruction based on the Kentucky Early Childhood Standards. Preschool students are also provided with enrichment experiences in which they explore art, music, math, literacy, STEM, social and emotional learning, and other gross motor skill development opportunities. Preschool students are also provided with breakfast prior to the start of the school day and with lunch before dismissal.⁶²² During focus groups and interviews, JCPS staff described preschool instruction that is differentiated and provided in smaller groups and through practices such as station learning, in which students move through different skill building activities using materials like play dough, sand, or through use of technologies such as tablets. Site visits conducted by the exam team in fall 2025 demonstrated students engaged in developmentally appropriate learning activities and classrooms arranged for station learning with a variety of activities and materials available and used by students. Survey respondents noted challenges with staff retention in preschool programs and pay rates for educational assistants as operational challenges related to programming for early learners.

JCPS staff also emphasized the importance of family engagement as part of a focus on the whole child. Described family engagement activities included weekly home visits, virtual home visits, phone meetings, parent and family school visits, and parents/families participation during field trips into the community.

Transportation is provided by JCPS for preschool students with IEPs as well as students who meet federal guidelines under the McKinney-Vento Act as experiencing homelessness.⁶²³ The ECE Department collaborates with JCPS's Transportation Department regarding early childhood program locations, compliance requirements, and route planning. The Executive Director of Early Childhood within the ECE Department supervises a Budget and Management Operations Specialist within the ECE office, and the specialist manages the operations of early childhood transportation and coordinates with the Transportation Department around logistics. Survey data reflected some concern that transportation is not provided for preschool students who are eligible based on family income..

During focus groups and interviews with JCPS staff, the inclusive model for providing early childhood programming to students with disabilities was described as a key strength. It was noted that JCPS provides two special classrooms for vulnerable students within one school site. However, outside of that exception, JCPS provides programming for preschool learners with IEPs in inclusive environments.

Figure 203 provides a comparison of early childhood placement in the LRE between JCPS and similar school districts.

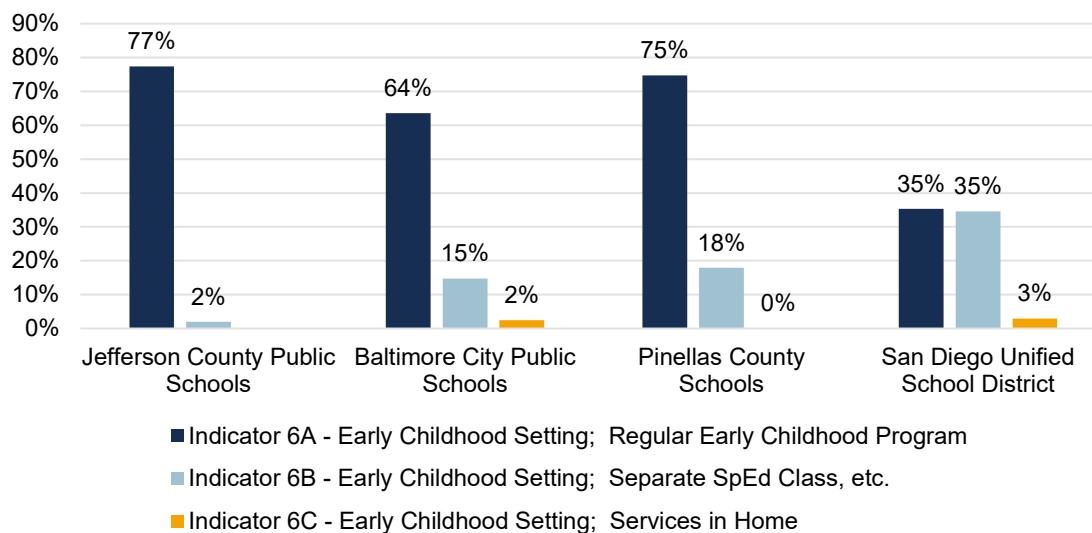
⁶²⁰ "[Early Childhood](https://www.jefferson.kyschools.us/o/jcps/page/early-childhood)." Jefferson County Public Schools. Retrieved December 18, 2025. <https://www.jefferson.kyschools.us/o/jcps/page/early-childhood>.

⁶²¹ "[About Thrive by 5 Louisville](https://thriveby5louisville.org)." Thrive by 5 Louisville. Retrieved December 31, 2025. <https://thriveby5louisville.org>.

⁶²² "[Early Childhood One Pager Oct. 2025](https://drive.google.com/file/d/1SCVlqmayXirm-Jd8qMANLqYhYOrnX4hu/view)." Jefferson County Public Schools. Published October 2025. Retrieved December 19, 2025. <https://drive.google.com/file/d/1SCVlqmayXirm-Jd8qMANLqYhYOrnX4hu/view>.

⁶²³ Ibid.

FIGURE 203: EARLY CHILDHOOD SPECIAL EDUCATION SETTINGS (SPP INDICATOR 6) IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



Sources: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard; Maryland State Department of Education State Performance Plan Results website; Florida Department of Education, Exceptional Student Education website; California Department of Education Annual Performance Report Measures.

Note: Data for comparison districts were publicly available for the three districts shown in the figure, excluding Duval County Public Schools, Guilford County Schools, and Metropolitan Nashville Public Schools.

Placements of preschool students with disabilities in the District are reported similarly to that of school age students with disabilities in other comparable school districts through the SPP/APR.

- In the 2023-24 school year, JCPS educated just over 77% of preschoolers with disabilities in regular preschool settings alongside preschoolers without disabilities, and the District met the KDE established state target for this indicator.
- In previous years, 2022-23 and 2021-22, JCPS did not meet the state's established indicator target. However, the District educated preschoolers with disabilities within regular preschool settings at rates above 70% during those years.
- JCPS's performance on SPP Indicator 6 exceeds that of comparison districts, indicating an inclusive early childhood program for young children with disabilities.

Preschool Outcomes

The exam team examined the degree to which JCPS preschool students are meeting outcome targets, such as kindergarten readiness expectations and state/federal indicators for preschool children with disabilities. The results of this examination are summarized in this section.

Finding	
12.11	JCPS's early learning programs have consistently failed to prepare preschool students with disabilities for kindergarten.

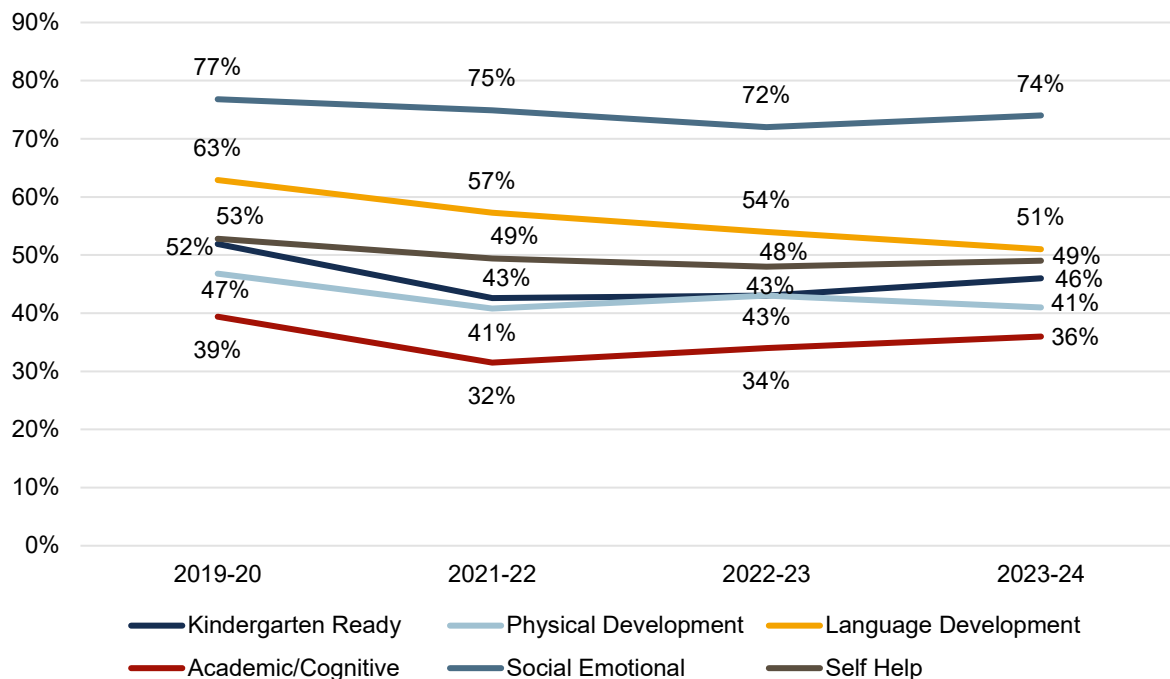
Kindergarten readiness encompasses a set of developmental domains that collectively indicate a child's preparedness for school. These domains include overall readiness, which reflects a child's ability to engage in structured learning environments and physical development, which involves motor skills and health necessary for classroom participation.

- Language development is critical for communication and early literacy, while academic and cognitive skills measure foundational knowledge, such as number sense and problem-solving.

- Social and emotional development addresses a child's capacity to form relationships, regulate emotions, and interact positively with peers and adults.
- Self-help skills focus on independence in daily routines, such as dressing, feeding, and managing personal needs.

Together, these elements provide a comprehensive picture of each preschool child's readiness to succeed in kindergarten.

FIGURE 204: JEFFERSON COUNTY PUBLIC SCHOOLS KINDERGARTEN READINESS FOUR YEAR TRENDS, 2019-20 TO 2023-24 SCHOOL YEARS



Source: Jefferson County Public Schools Kindergarten Readiness Trend Data- 10.24.

Kindergarten readiness in JCPS declined after 2020 and has not fully rebounded in the proceeding school years. The District's most notable ongoing challenge is in Language Development. This area has seen a consistent downward trend and remains below earlier trends in the 2019-20 school year. Academic/Cognitive skills show a similar pattern of decline but a modest recovery from the 2021-22 school year, suggesting some improvement yet continued gaps in this foundational area. By contrast, Social Emotional skills remain a relative strength for JCPS preschool students, and both Physical Development and Self-Help skills have remained comparatively stable. When taken together, these trends suggest that, while early learners are regaining ground in some areas, key early learning domains, especially language development and academic and cognitive skills, require focused support by the District to accelerate recovery.

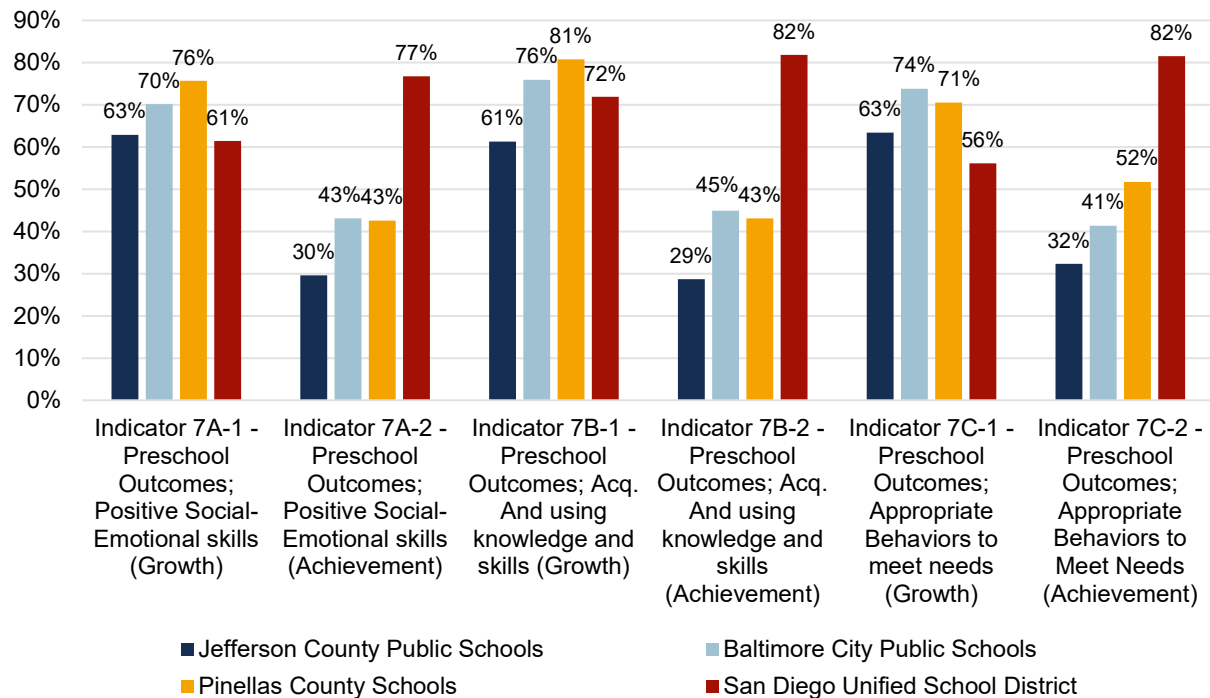
State Performance Plan (SPP) Indicator 7 requires states to collect data regarding the outcomes of preschool children (ages 3-5) with disabilities. The purpose of this indicator is to determine the degree to which a district's special education services support child development prior to entering kindergarten. Federal regulations require states and districts to analyze and report data related to preschool outcomes in the areas of:

- Positive social/emotional skills, including social relationships (Indicator 7-A)
- Acquisition and use of knowledge and skills including early language, communication, and early literacy (Indicator 7-B)

- Use of appropriate behaviors to meet student needs such as independence and self-help skills (Indicator 7-C)

Data is collected when a student with an IEP enters and exits preschool with respect to each area. JCPS collects this data using the domains of Kindergarten readiness described above. The first part of Indicator 7 (A1, B1, and C1) reflects the percentage of students who demonstrated improvement and the second part of Indicator 7 (A2, B2, C2) reflects the percentage of students performing within age-appropriate limits upon completion of preschool.

FIGURE 205: PRESCHOOL OUTCOMES (SPP INDICATOR 7) IN JEFFERSON COUNTY PUBLIC SCHOOLS AND PEER DISTRICTS, 2023-24 SCHOOL YEAR



Sources: Kentucky Center for Statistics Kentucky Special Education Indicator Dashboard; Maryland State Department of Education State Performance Plan Results website; Florida Department of Education, Exceptional Student website; California Department of Education Annual Performance Report Measures.

Note: Data for comparison districts were publicly available for the three districts shown in the figure, excluding Duval County Public Schools, Guilford County Schools, and Metropolitan Nashville Public Schools.

SPP Indicator 7 data represented in Figure 205 shows that JCPS preschool children with IEPs are showing improvements (roughly 61% to 63% across Indicator 7 A1, B1, and C1) between the time they enter and the time they exit the District's preschool program. This indicates that special education and related services provided to preschool children with disabilities are supporting developmental gains in each area while children are participating in a preschool program. However, JCPS has lower rates of age-appropriate functioning at the time of preschool exit than what is demonstrated by comparison districts (about 29% to 32% in across Indicator 7 A2, B2, and C2), suggesting that children are making progress toward readiness but are not reaching the age-expected benchmarks in these areas by the time the exit the preschool program.

Recommendations	
12.11.a	The District should examine success factors related to student performance in social and emotional readiness and identify replicable structures to increase rates of student success across other aspects of Kindergarten readiness.
12.11.b	JCPS should examine best practices utilized in comparable districts related to early childhood special education, identify priorities for program improvement, and develop an implementation plan to build staff capacity and strengthen Kindergarten readiness.

CHAPTER 13: MULTILINGUAL RESOURCES & SUPPORTS

OVERVIEW

This chapter describes JCPS practices, programs, and initiatives that support Multilingual Learners (ML). Within the Academics Division, the Office of Multilingual Learners (OML) is primarily responsible for helping schools effectively serve MLs. OML's work is supported by other Central Office divisions, including Exceptional Children Education (ECE), Schools, and the Office of the Chief of Staff (Culture & Climate and Student Support Services). This chapter primarily focuses on OML's work.

Throughout this chapter, the exam team uses JCPS's terminology ("multilingual learners") to refer to this particular student population. Kentucky state guidance uses the term "English learner." When citing Kentucky statutes or guidance, or presenting Kentucky data in figures, the exam team uses Kentucky's terminology.

VISION & STRATEGY

Finding	
13.1	While JCPS has an asset-based vision for supporting ML students, the District lacks a clear, actionable plan for supporting ML student achievement.

JCPS's vision is for all MLs to become "successful English language readers, writers, listeners, and speakers in a welcoming and culturally responsive environment."⁶²⁴ This vision is supported by the work of OML, which provides English Language Development (ELD) instructional supports intended to increase access to grade-level instruction and support MLs' academic and social development. Resources include coaching, professional learning, program consultation, curriculum resources, and professional learning community (PLC) support for schools. JCPS's curricular approach is guided by the University of Wisconsin-Madison's WIDA's Guiding Principles of Language Development, which emphasizes asset-based, whole-child instruction and the development of language through meaningful, supported interaction.⁶²⁵ An asset-based approach focuses on what students know and can do, rather than approaching English language development as a deficiency.⁶²⁶

In interviews and focus groups, staff consistently described the District's approach to supporting MLs as asset-based. Staff cited the District's use of the term "multilingual learner," rather than "English language learner," as one example of this approach. "Multilingual learner" emphasizes a student's capacity to develop proficiency in more than one language, while "English language learner" focuses only on their acquisition of English. Overall, the exam team observed that staff demonstrated a shared understanding of the District's vision for MLs.

Although Superintendent Yearwood signaled that JCPS will move away from the "Goals and Guardrails," they still exist as the District's guiding strategy as of March 2026. Guardrail Four, Protect Equitable Resourcing, is the only component that explicitly addresses MLs. The Guardrail states, "JCPS shall not allow inequitable resource allocation for ECE students and/or ML students."⁶²⁷ More specifically, Interim Guardrail 4.2, English Language Proficiency, articulates the District's goal that "the percentage of Multilingual Learners showing growth on English Language Proficiency assessment (ACCESS for ELLs)

⁶²⁴ "Office of Multilingual Learners." Jefferson County Public Schools. Retrieved December 10, 2025.

<https://www.jefferson.kyschools.us/page/office-of-multilingual-learners>

⁶²⁵ "WIDA Guiding Principles of Language Development." WIDA. Retrieved January 23, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/d9ba10de-e4e1-45e7-b133-4a359834788f/Guiding-Principles-of-Language-Development.pdf?disposition=inline

⁶²⁶ "Understanding Multilingual Learners." WIDA. Retrieved April 20, 2026. <https://wida.wisc.edu/teach/multilingual-learners>

⁶²⁷ "Goals & Guardrails." Jefferson County Public Schools. Retrieved January 23, 2026. <https://www.jefferson.kyschools.us/o/jcps/page/goals-and-guardrails>

by moving up a performance level category will increase from 56% in June 2023 to 63% by June 2027.” However, it is unclear the extent to which this goal is informing District activities. The exam team did not hear references to this goal during interviews or focus groups with staff.

According to 703 KAR 5:225, JCPS is required annually to create a Comprehensive District Improvement Plan (CDIP) that outlines the District’s goals, activities, and measures of success to support continuous improvement.⁶²⁸ “English Learner Progress” is one of five Priority Indicators in the plan, in alignment with Kentucky’s accountability system. JCPS’s goal is as follows:

“By the end of 2028-2029 school year, our district will increase the English Language Proficiency Rate to the following (Baseline in 2024-2025):

- Elementary: 43.0% to 45.8%
- Middle: 18.8% to 40.2%
- High: 19.3% to 49.4%”⁶²⁹

While this goal differs from the one above, it is consistent with the expectations of the state accountability system. More about the District’s CDIPs are shared in **Chapter 10: Assessments, Accountability, & Systems Improvement**.

JCPS has established goals related to English language proficiency; however, the exam team found these goals are not consistently communicated in a way that supports Districtwide planning and implementation. With the District’s shift away from the Goals and Guardrails, the exam team did not hear any indication that Guardrail Four was guiding the work of Central Office staff or school leaders in supporting MLs. The District’s ML-related CDIP goal was also not referenced. In addition, the District does not have a documented strategy that describes how it will support ML outcomes beyond English language proficiency, including academic achievement in core content areas and broader indicators of student success. A Districtwide ML strategy would be strengthened by clearly aligning ML goals, key initiatives, and measures of progress to the District’s broader academic strategy. More about the District’s strategy is discussed in **Chapter 1: District Leadership & Strategy** and **Chapter 9: Curriculum & Instruction**.

Recommendation	
13.1.a	JCPS should develop and implement a clear, Districtwide strategy for supporting ML achievement that translates the District’s asset-based vision into actionable goals, defined strategies, and measurable outcomes aligned to its broader academic strategy.

OFFICE OF MULTILINGUAL LEARNERS (OML)

Overview

OML provides wraparound support to schools, including identification, registration assistance, instructional support, and language services.⁶³⁰ The Office was established during Superintendent Pollio’s tenure in response to JCPS’s growing ML population. As of March 2026, OML is led by an Assistant Superintendent of Multilingual Learners. Five staff report directly to the Assistant Superintendent and manage distinct portfolios related to ML instructional and other non-instructional supports.

In addition to OML’s school-based supports (described in more detail in the **Multilingual Learner Supports** section below), OML operates the Welcome Center and oversees the District’s Language Services

⁶²⁸ “[Comprehensive Improvement Planning for Schools and Districts](https://www.education.ky.gov/school/csip/Pages/default.aspx).” Kentucky Department of Education. Published September 29, 2026. Retrieved April 20, 2026. <https://www.education.ky.gov/school/csip/Pages/default.aspx>

⁶²⁹ “[Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](https://drive.google.com/file/d/1kgFmR6jEFm9yb2hl-ZaNX-dx5N9QfuM7/view).” Jefferson County Public Schools. Retrieved March 4, 2026. <https://drive.google.com/file/d/1kgFmR6jEFm9yb2hl-ZaNX-dx5N9QfuM7/view>

⁶³⁰ “[Office of Multilingual Learners](https://www.jefferson.kyschools.us/page/office-of-multilingual-learners).” Jefferson County Public Schools. Retrieved March 4, 2026. <https://www.jefferson.kyschools.us/page/office-of-multilingual-learners>

department. The Welcome Center provides family-facing support services, including enrollment and initial English language proficiency screenings. OML's Language Services provides in-person, remote, and phone-based interpretation, as well as written translation services.⁶³¹

District staff emphasized the need for collaboration between OML and other District divisions, including Schools, ECE, and other teams within Academics. Staff provided specific examples of coordination between ECE and Academics; however, they described fewer specific examples of regular coordination with the Schools division. Collaboration across these divisions is discussed in additional detail in **Chapter 9: Curriculum & Instruction**.

Effective July 1, 2026, and as part of the approved organizational changes proposed by Superintendent Yearwood, OML will remain under the Chief Academic Officer. The Assistant Superintendent of Multilingual Learners position will be eliminated. The current Executive Director role will now report to the Assistant Superintendent of Instructional Programming and will oversee OML staff and the Office's portfolio of work. Based on the exam team's review of the revised organizational chart, it does not appear that any major functions of OML will be eliminated in the reorganization.

Multilingual Learner Enrollment, Identification, and Placement

When families enroll a student in JCPS, the parent/guardian completes a Home Language Survey to document the language(s) used in the home. If a survey response indicates a language other than English is used, then the student is required to complete an initial English language proficiency screening using WIDA tools (the Kindergarten Screener for kindergarten and WIDA Screener Online for grades 1–12). Students who do not meet the 4.5 overall composite benchmark are identified as MLs, and JCPS is expected to complete this identification process within 30 calendar days. Identified students are offered a Language Instruction Educational Program (LIEP) through ELD services; however, if a parent/guardian declines ELD services, the student's ML status does not change, and the student remains included in the accountability model.

Both the Welcome Center and JCPS schools support enrollment and identification activities. In interviews and focus groups, District staff described intentional efforts to strengthen school-based capacity to support enrollment steps — including completion of the Home Language Survey — given the number of Welcome Center staff and the large number of multilingual families enrolling in JCPS. Language Services supports these efforts by providing translation and interpretation services for families.

MULTILINGUAL LEARNER POPULATION

Growth in Population

The population of MLs has increased significantly over the last five years. Figure 206 shows the growth in ML enrollment in JCPS since the 2020-21 school year. ML enrollment increased from 11,750 students in the 2020-21 school year to 20,094 students in 2025-26 school year. In the 2025-26 school year, MLs represented 21% of total student enrollment, an increase of nine percentage points from the 2020-21 school year.⁶³²

Figure 206 also shows that ML enrollment increased each year from the 2020-21 school year through the 2025-26 school year; between the 2024-25 and 2025-26 school years, MLs continued to represent 21% of total enrollment. JCPS's ML share is significantly higher than the statewide average; in the 2024-25 school year, 8.3% of students statewide were identified as MLs.⁶³³

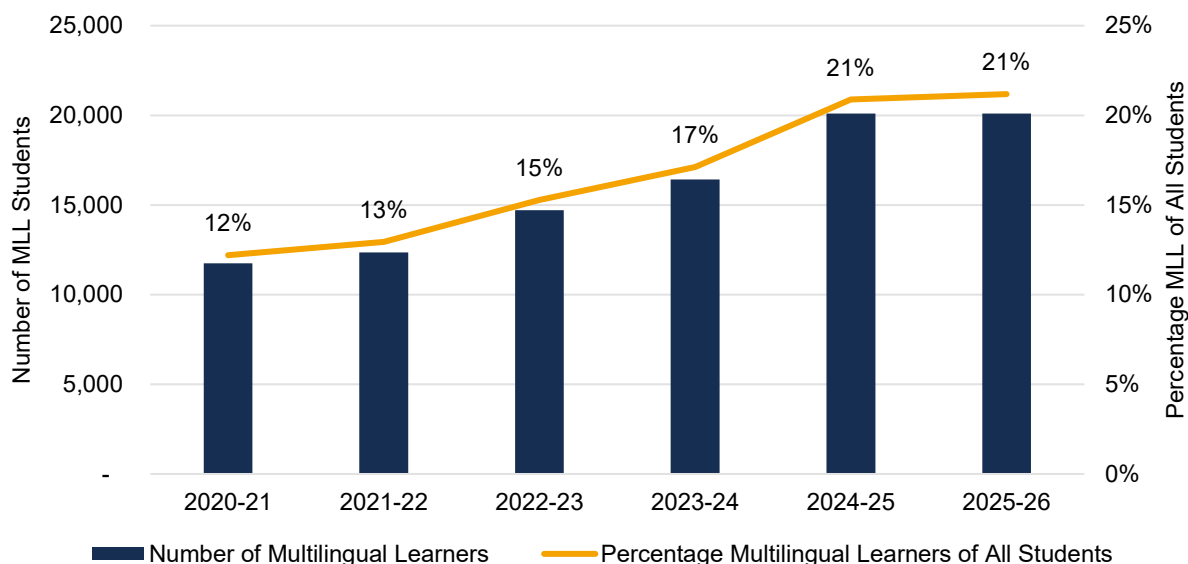
⁶³¹ "[Language Services](https://www.jefferson.kyschools.us/page/language-services)." Jefferson County Public Schools. Retrieved March 4, 2026.

<https://www.jefferson.kyschools.us/page/language-services>

⁶³² "[Cascade Data Portal: Multilingual Learners \(ML\) Enrollment 24-25](https://assessment.jefferson.kyschools.us/PublicDatasets/PublicResources.aspx?id=511640)." Jefferson County Public Schools. Retrieved December 11, 2025. <https://assessment.jefferson.kyschools.us/PublicDatasets/PublicResources.aspx?id=511640>

⁶³³ "[Report Card Dashboards: Jefferson County](https://reportcard.kyschools.us/kysrc?organization=20242025:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=93dd2cb4-ea1e-437a-3f17-3a1b456f59a7&vizIndex=0)." Kentucky Department of Education. Retrieved December 11, 2025. <https://reportcard.kyschools.us/kysrc?organization=20242025:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=93dd2cb4-ea1e-437a-3f17-3a1b456f59a7&vizIndex=0>

FIGURE 206: JEFFERSON COUNTY PUBLIC SCHOOLS MULTILINGUAL LEARNER POPULATION, 2020-21 TO 2025-26 SCHOOL YEARS



Source: Jefferson County Public Schools CASCADE Data Portal.

As of the 2024-25 school year, approximately 154 languages are spoken among JCPS MLs. The five most common languages spoken across the District have remained consistent over the past four school years: Arabic, Kinyarwanda, Spanish, Somali, and Swahili. Spanish was the most common home language; 50% or more of MLs spoke Spanish as their home language across the past four school years. “Other” languages made up the second most common language with approximately a quarter of students speaking a language that fell into this category. Arabic, Kinyarwanda, Somali, and Swahili separately each represented between 3-7% of students’ home languages each year.⁶³⁴

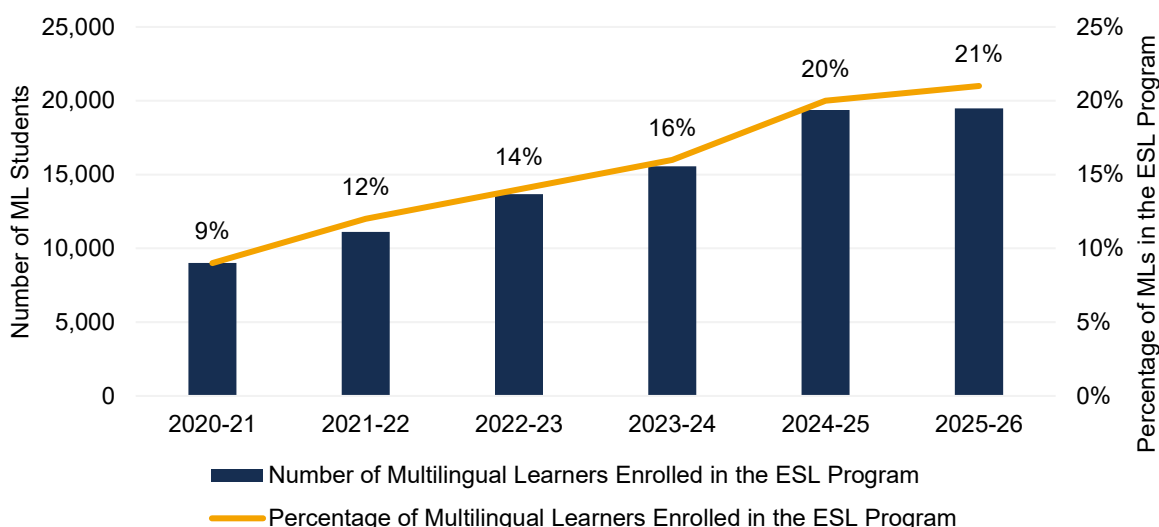
English as a Second Language (ESL) Enrollment

The overall ML population includes all students identified through the District’s identification process (e.g., home language survey and screener), while English as a Second Language (ESL) enrollment reflects the subset of identified students who are actively receiving ESL services. As a result, ESL enrollment may exclude some students included in the overall ML population, such as students whose families have declined services where permitted.

Figure 207 summarizes JCPS’s ESL enrollment from the 2020-21 school year through the 2025-26 school year. Over this period, ESL enrollment increased each year and generally tracked the growth of JCPS’s ML population. By the 2025-26 school year, ESL enrollment reached its highest level in the period shown, indicating that a substantial number of MLs are served through ESL services in JCPS.

⁶³⁴ “[Report Card Dashboards: Jefferson County](https://reportcard.kyschools.us/kysrc?organization=20242025:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=93dd2cb4-ea1e-437a-3f17-3a1b456f59a7&vizIndex=0).” Kentucky Department of Education. Retrieved December 11, 2025. <https://reportcard.kyschools.us/kysrc?organization=20242025:275:275000&sid=067d36f5-dbf5-4fc8-3b2c-3a1288364f74&gid=93dd2cb4-ea1e-437a-3f17-3a1b456f59a7&vizIndex=0>

FIGURE 207: JEFFERSON COUNTY PUBLIC SCHOOLS ESL ENROLLMENT, 2020-21 TO 2025-26 SCHOOL YEARS

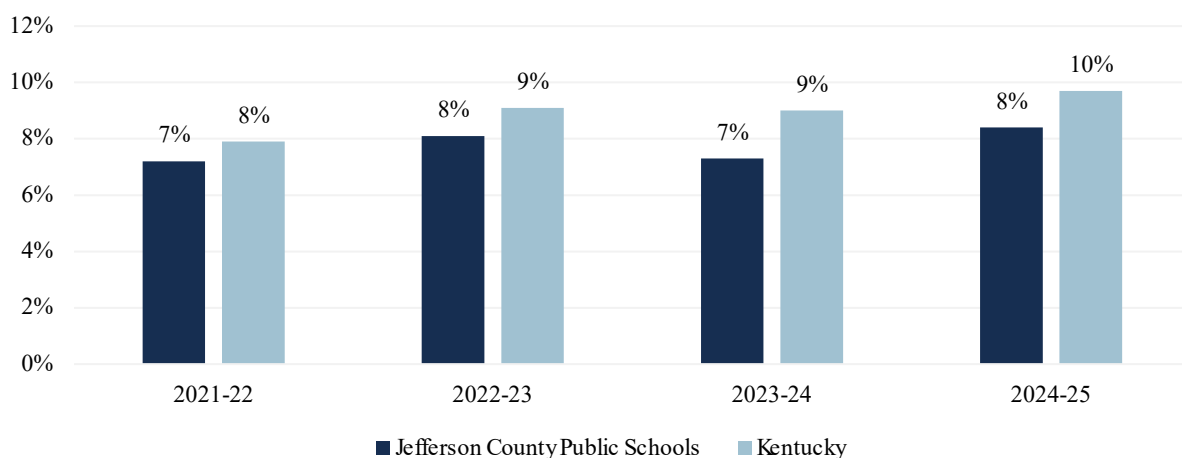


Source: Jefferson County Public Schools CASCADE Data Portal.

English Language Proficiency

Figure 208 represents English language proficiency in JCPS and Kentucky from the 2021-22 school year to the 2024-25 school years. All students identified as English Learners (EL) in Kentucky take the WIDA Assessing Comprehension and Communication in English State-to-State (ACCESS) for English Language Learners (ELL) annually to measure English language proficiency across listening, speaking, reading, and writing domains. English language proficiency is measured by students earning an overall composite score of 4.5 or higher on the ACCESS for ELLs assessment, with the attainment rate showing the percentage of students who meet this benchmark. Proficiency rates in JCPS lagged slightly behind the state, with a consistent one to two percentage point gap since the 2021-22 school year. In the 2024-25 school year, 8% of MLs reached the ACCESS for ELLs proficiency benchmark in JCPS, compared to 10% in the state.

FIGURE 208: JEFFERSON COUNTY PUBLIC SCHOOLS AND KENTUCKY ENGLISH LANGUAGE PROFICIENCY ATTAINMENT RATE, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

MULTILINGUAL LEARNER SUPPORTS

Service Delivery Models

JCPS employs several service delivery models to support MLs, emphasizing an asset-based approach that is grounded in federal law.⁶³⁵ JCPS offers the ELD program for MLs in all schools and at every level. ML instruction is collaborative, with ELD teachers working with content teachers to design lessons. All JCPS schools have access to at least one certified ELD teacher. All MLs receive Tier I core instruction (e.g., regular, grade-level instruction) plus any needed interventions, guided by Kentucky Academic Standards, WIDA Language Standards, and ongoing assessment data. JCPS employs the following instructional models and programming to support MLs:⁶³⁶

- **ELD Pull-Out (POE) or “Pull-Out”:** ML students are pulled from general classrooms for small-group English instruction.
- **Content-Based ELD (CBE):** English is taught through core subjects (math, ELA, science, social studies) by ELD teachers.
- **Structured English Immersion (SEM) or “Co-Teaching”:** ELD teachers co-teach alongside classroom teachers in general classrooms, providing explicit language instruction alongside content.
- **Sheltered English Instruction (SEI):** Providing language scaffolds to make academic instruction in English comprehensible for students.
- **Two-Way Immersion (TWI):** Bilingual programs where English and the MLs’ primary language are used in content and language arts instruction, serving both English-proficient and ML students.⁶³⁷

Central Office staff noted they advocate for the use of co-teaching, particularly to support students with a proficiency Level 3 or above in elementary schools, while the “pull-out” model is best for students with Levels 1-2 of proficiency. At the middle and high school level, students receive content-based ELD instruction in a separate class period. Middle and high school students are grouped for content-based ELD with consideration for both their ACCESS level and the number of years they’ve attended a school in the United States. Central Office staff described course placement guidance and master scheduling supports to support schools in these efforts.

A challenge noted by interviewees was the distinction between an ELD teacher “assisting” in the classroom and true co-teaching, in which the ELD and classroom teachers share responsibility and work as equals. They described moving toward a consistent, true co-teaching model as an area of growth for the District. Participants noted that doing this well requires a high level of instructional skill from both teachers, as well as dedicated collaborative planning time that must be intentionally built into schools’ master schedules. Central Office staff also noted that decisions regarding instructional models are ultimately a school-level decision.

While these service delivery models describe how ELD support is structured for students, effective implementation is influenced by schools’ ability to communicate with students and families in the languages they use at home.

Figure 209 shows that most students who speak English at home agreed that adults in school communicate with them in their home language, but only 37% of students who speak a different language at home agreed with that same statement. Almost all families who speak English at home agreed that schools communicate with them in their preferred language; this number only falls to 85% for families that speak another language at home.

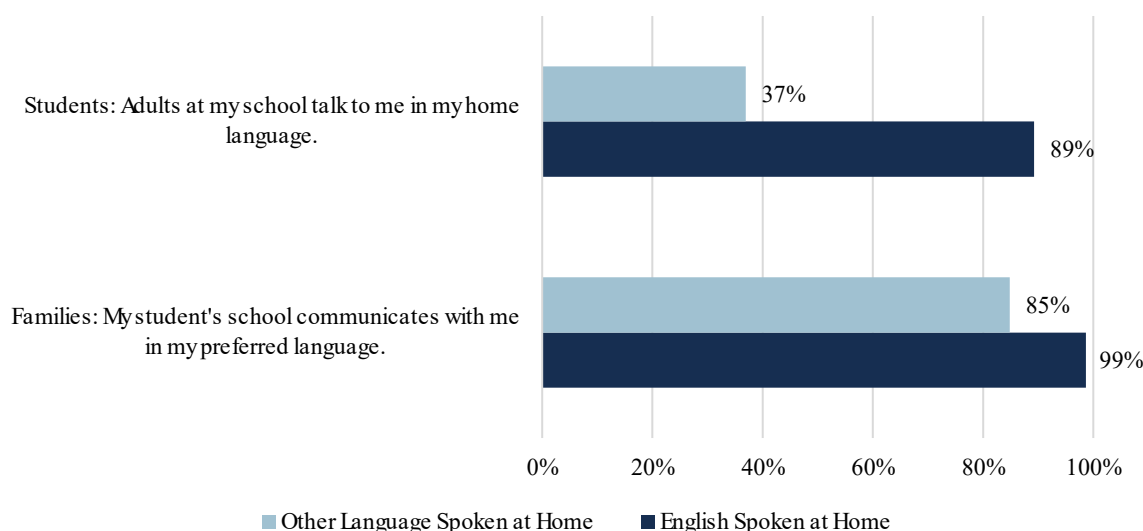
⁶³⁵ “[Lau Plan 2025-2026](#).” Jefferson County Public Schools. Retrieved November 13, 2025.

<https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=948770>

⁶³⁶ Ibid.

⁶³⁷ Ibid.

FIGURE 209: STUDENT AND FAMILY PERCEPTIONS OF MULTILINGUAL COMMUNICATIONS



Source: Special Examination Survey.

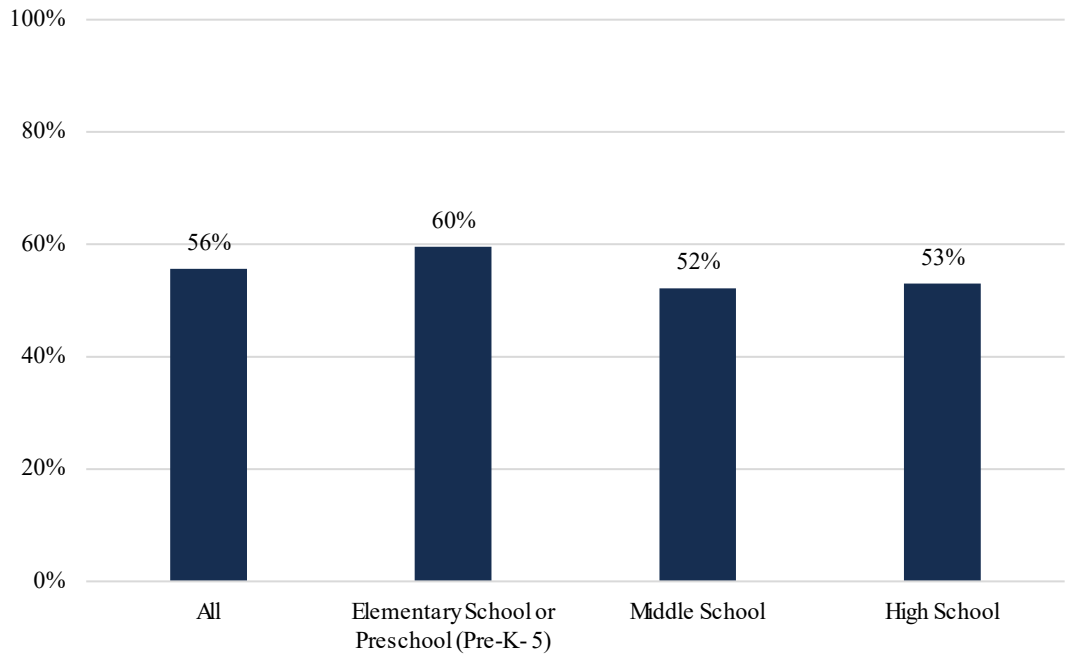
Curriculum and Instructional Resources

JCPS staff reported that in the 2024-25 school year, OML started to roll out ML-specific guidance connected to the High Quality Instructional Resources (HQIRs). In interviews and focus groups, staff shared the District has developed curriculum frameworks that are designed to make HQIR implementation easier to navigate for teachers by organizing unit materials in a consistent structure (e.g., standards, lesson sequences, and embedded supports for MLs).

Interviewees also described District guidance and resources specific to ELD coursework and service delivery, particularly at the secondary level. Staff reported JCPS provides a foundational ELD curriculum that is in the early stages of implementation (noted as Year 1 in middle school and Year 2 in high school). To support implementation of these curricular and program resources, staff noted OML and its instructional team provide ongoing professional learning and coaching (including quarterly academies), as well as consultation to support schools' instructional models and scheduling decisions.

The exam team did not assess the effectiveness of these specific resources; however, Figure 210 below shows that just over half of school-based staff agreed that their schools have sufficient resources to meet the needs of MLs. Agreement was highest among elementary staff (60%) and slightly above 50% among middle and high school staff. These results suggest that JCPS has an opportunity to strengthen the consistency and fidelity of its ML resources across schools.

FIGURE 210: SCHOOL-BASED STAFF AGREEMENT WITH "RESOURCES ARE SUFFICIENT TO MEET THE NEEDS OF MULTILINGUAL LEARNERS IN MY SCHOOL," BY GRADE BAND



Source: Special Examination Survey.

Staffing and Capacity Building

Finding	
13.2	District staff identified building the capacity of all educators to effectively serve Multilingual Learners (MLs) as an area of growth.

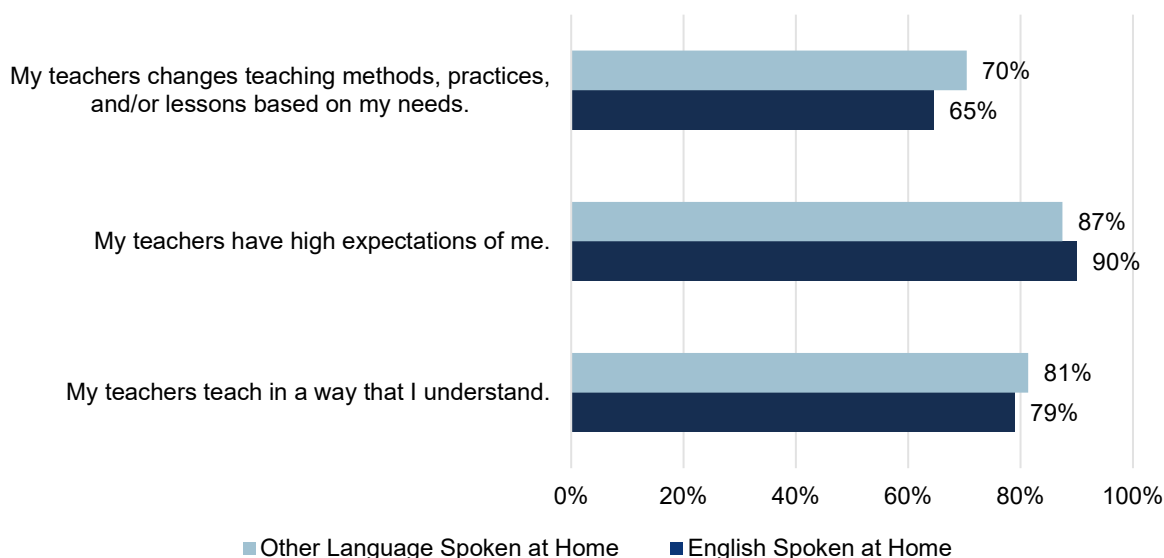
JCPS provides school-level staffing to support MLs primarily through certified ELD teachers; District leadership reported that every school has at least one ELD teacher. The number and service delivery model of ELD teachers vary by school. Interviewees shared that implementing a high-quality co-teaching model requires intentional planning and skill development to ensure shared instructional responsibility, and they noted this as a growth area. In addition to ELD teachers, some schools are staffed with Bilingual Associate Instructors (BAIs) to provide language and instructional support; however, Central Office staff described the BAI role as historically difficult to fill and noted efforts to strengthen recruitment and retention (e.g., job fairs and a summer BAI institute intended to build community and support for BAIs). Beyond these two roles, content teachers play a critical role in supporting MLs, given that MLs comprise approximately one-fifth of the District's total enrollment.

In interviews and focus groups, District staff identified building all educators' capacity to effectively serve MLs as an area for growth. They pointed to the need to strengthen content teachers' ability to integrate language supports and differentiate instruction for MLs. As discussed in **Chapter 9: Curriculum & Instruction**, the exam team observed classrooms with MLs at different proficiency levels in which teachers were not consistently using strategies to support students' language needs. Examples of missed opportunities included using visual cues, chunking directions, teaching and reusing common sentence starters and discussion protocols, and intentionally pairing students.

Figure 211 shows student survey respondents reported largely similar perceptions of teachers' instructional practices, regardless of the language spoken at home. Students who spoke a language other than English at home were slightly more likely to agree that teachers adjust their methods, practices, and/or lessons to

meet their needs (70% vs. 65%). Taken together, these results suggest that, from students' perspectives, teachers are using some supportive strategies, though opportunities remain to strengthen practice.

FIGURE 211: STUDENT PERCEPTIONS OF TEACHERS' INSTRUCTIONAL PRACTICES



Source: *Special Examination Survey*.

Recommendation	
13.2.a	JCPS should assess the effectiveness of its professional development and coaching supports for serving MLs and strengthen them as needed to ensure all teachers can consistently implement differentiated instructional strategies and effective co-teaching practices.

High-Density Schools

JCPS selects “high-density” schools to receive additional Central Office supports based on schools’ total number of MLs enrolled, ratio of MLs to total school population, and ratio of newcomers to total ML population. District staff described the high-density designation as a shift made in the 2024-25 school year to more strategically allocate resources and provide additional support to schools with the greatest need. In the 2024-25 school year, there were a total of 16 high-density schools—eight elementary, two middle, and six high schools.⁶³⁸ Many large urban districts use a similar approach of identifying schools with higher concentrations of student need and then providing additional targeted funding, staffing, and/or Central Office support to help those schools meet students’ needs.

High-density schools get extra support compared to other JCPS schools. Secondary schools receive an extra ML-focused counselor position to help address student needs such as transcript evaluation, academic planning, and social-emotional supports. High-density schools also receive prioritized coaching supports from OML. JCPS staff reported there were four Specialists of ML Instruction positions, as well as five Instructional Lead positions, that provided prioritized support to these schools. Central Office staff, beyond OML, noted a school’s high-density designation was often considered when deciding how to allocate supplemental support to schools.

The exam team reviewed JCPS’s end-of-year expectations rubrics for elementary and secondary high-density schools. District staff explained the rubric is informational in nature, and it is used to guide debrief

⁶³⁸ “JCPS High-Density Schools.” Jefferson County Public Schools. October 24, 2025. [Microsoft Word]

conversations between Central Office staff and school leadership periodically throughout the year. The rubrics are designed to support continuous improvement by defining what strong ML systems look like and how implementation should deepen over time. The rubrics organize expectations across focus areas, including welcoming and inclusive environments, program infrastructure, instructional practice and staff capacity-building, family engagement, and student supports. Each focus area includes descriptions of what “Year 1,” “Year 2,” and “Year 3 & Beyond” implementation looks like and names the school roles responsible.

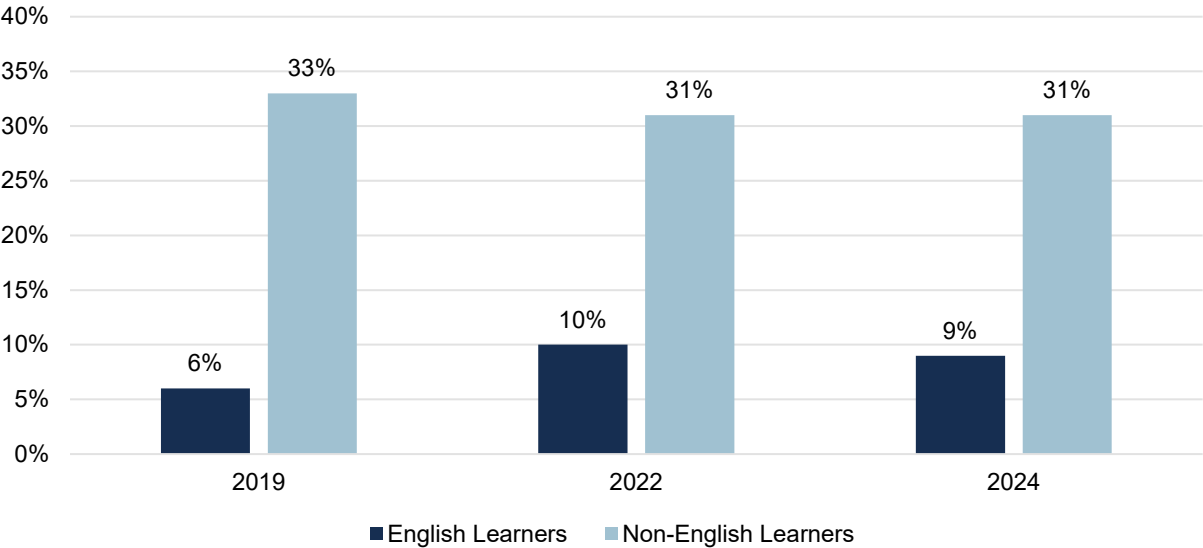
Student Achievement

National Assessment of Educational Progress (NAEP)

Finding	
13.3	JCPS has an achievement gap between ML And non-ML students.

Figure 212 represents the differences in Reading proficiency rates between ML and non-ML fourth graders in JCPS on the National Assessment of Educational Progress (NAEP). In 2024, there was a 22 percentage point gap between ML and non-ML students. In 2022, the gap was 21 percentage points and in 2019, it was 27 percentage points. While the difference in Reading proficiency between ML and non-ML students has declined by 5 percentage points from 2019 to 2024, there is still a significant disparity.⁶³⁹

FIGURE 212: JEFFERSON COUNTY PUBLIC SCHOOLS FOURTH GRADE READING NAEP PROFICIENCY RATES BY EL STATUS, 2019-2024



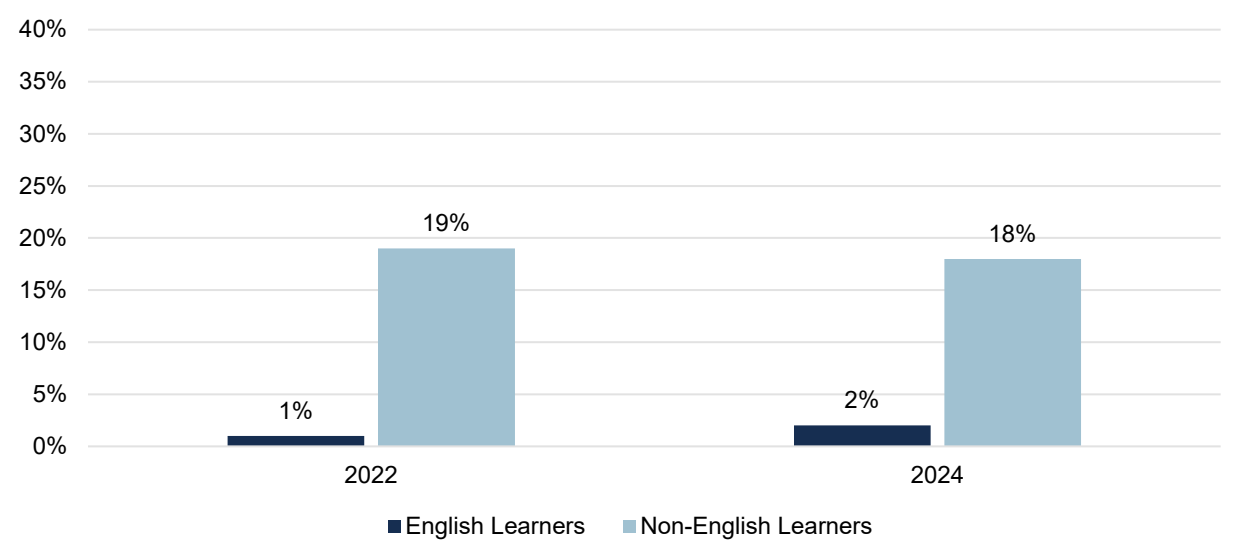
Source: *The Nation’s Report Card NAEP Data Explorer*.

Figure 213 represents the gap in Mathematics proficiency between ML and non-ML eighth graders on the NAEP. In 2022, there was an 18 percentage point gap between ML and non-ML students, declining slightly to a 16 percentage point gap in 2024. Note that the 2019 Mathematics proficiency scores for ML students were not reported by NAEP because their reporting standards were not met.⁶⁴⁰

⁶³⁹ “[NAEP Data Explorer](https://www.nationsreportcard.gov/ndecore/xplore/NDE).” The Nation’s Report Card. Retrieved December 10, 2025.
<https://www.nationsreportcard.gov/ndecore/xplore/NDE>

⁶⁴⁰ Ibid.

FIGURE 213: JEFFERSON COUNTY PUBLIC SCHOOLS EIGHTH GRADE MATHEMATICS NAEP PROFICIENCY RATES BY EL STATUS, 2022-2024



Source: The Nation’s Report Card NAEP Data Explorer.

Recommendation	
13.3.a	JCPS should use NAEP and other assessment data to inform targeted instructional supports, professional learning, and resource allocation aimed at reducing persistent achievement gaps between ML and non-ML students.

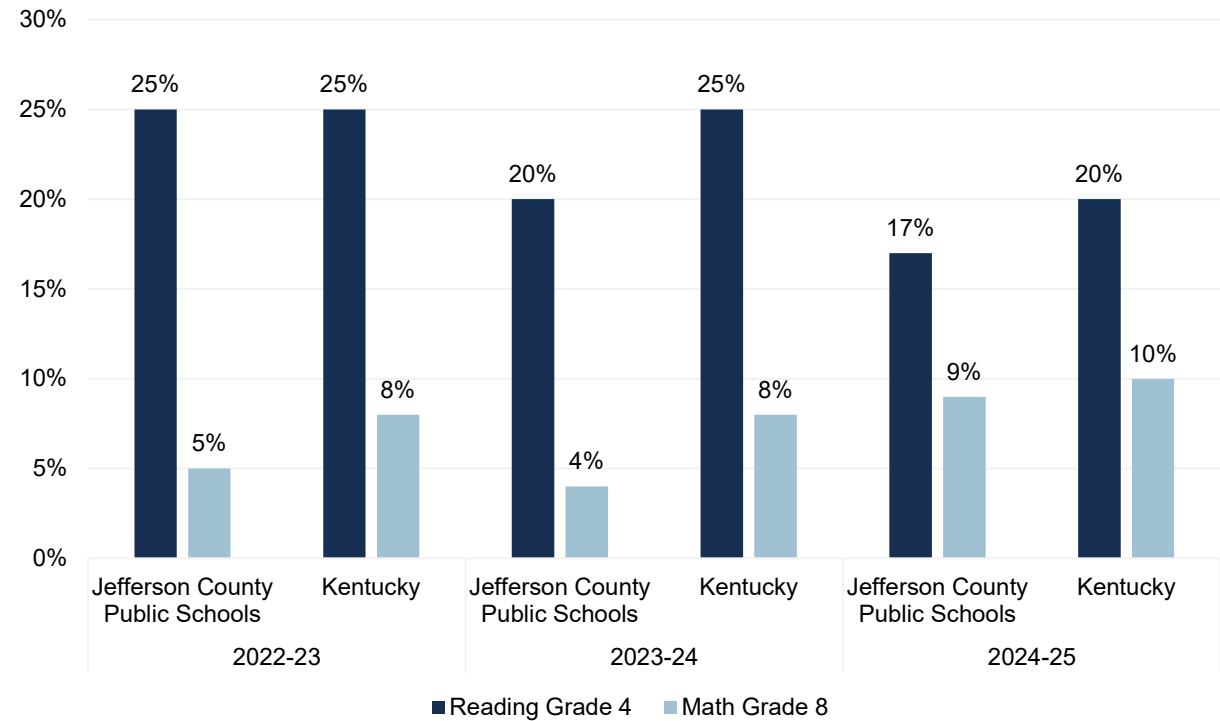
Kentucky Summative Assessment (KSA)

The NAEP results above show an achievement gap between ML and non-ML students in JCPS. The next section examines Kentucky Summative Assessment (KSA) results for MLs in JCPS compared with MLs statewide and describes how the ML/non-ML proficiency gap in JCPS compares with Kentucky overall.

To provide additional context on state assessment performance, the analysis below examines KSA proficiency trends for ML students in JCPS compared with ML students statewide. Specifically, Figure 214 shows Reading and Mathematics achievement on the KSA between ML students in JCPS and ML students in Kentucky over the past three years. In both Reading and Mathematics, excluding fourth grade Reading in the 2022-23 school year, ML students in JCPS slightly underperform compared to ML students in Kentucky. In 2023-24, for example, 20% of students in JCPS scored proficient or advanced in fourth grade Reading compared to 25% of ML students in Kentucky.⁶⁴¹ Notably, the gap between ML and non-ML proficiency improves between 2023-24 and 2024-25 for both fourth grade Reading and eighth grade Mathematics.

⁶⁴¹ “[Report Card Dashboards: Jefferson County](https://reportcard.kyschools.us/kysrc?organization=20212022:275:275000).” Kentucky Department of Education. Retrieved December 10, 2025. <https://reportcard.kyschools.us/kysrc?organization=20212022:275:275000>

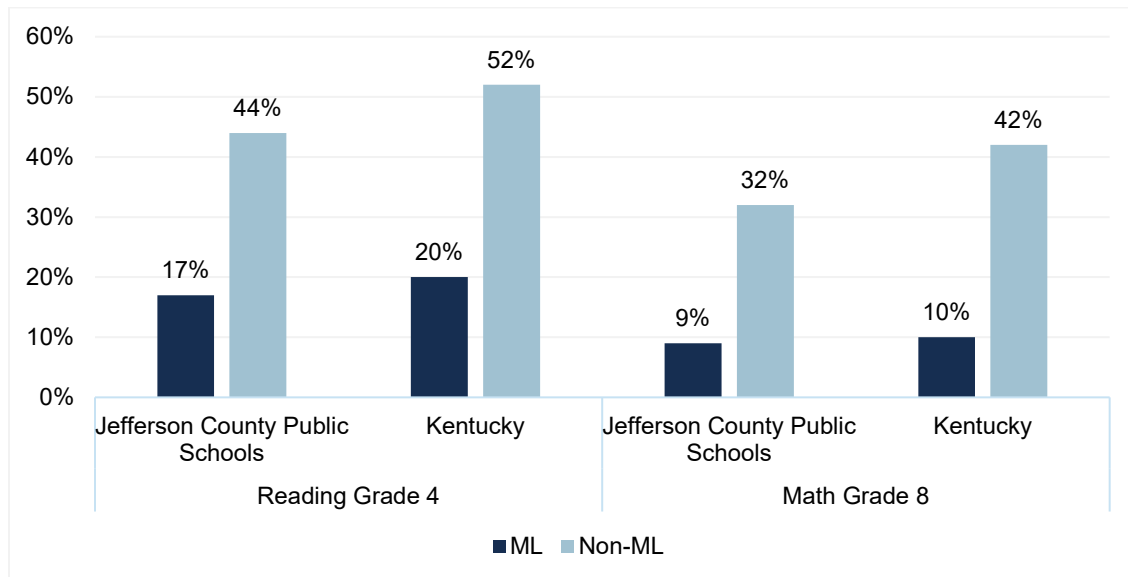
FIGURE 214: ML STUDENT PROFICIENCY ON THE KENTUCKY SUMMATIVE ASSESSMENT, 2022-23 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

To understand how ML performance compares to peers within the District and statewide, Figure 215 summarizes the 2024-25 KSA proficiency gap between ML and non-ML students in JCPS and Kentucky. The achievement gap between ML and non-ML students in both Reading and Mathematics proficiency is slightly smaller in JCPS than in Kentucky overall. In JCPS, the gap between ML and non-ML student Reading proficiency was 27 percentage points, compared to a gap of 32 percentage points in Kentucky. In Mathematics, the gap between ML and non-ML students in JCPS was 23 percentage points compared to 32 percentage points in the state.

FIGURE 215: ML AND NON-ML STUDENT PROFICIENCY ON THE KENTUCKY SUMMATIVE ASSESSMENT, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

CHAPTER 14: COLLEGE & CAREER READINESS

JCPS COLLEGE AND CAREER READINESS STRATEGY

Background

In recent years, JCPS has focused on building out programming and experiential learning opportunities for students to prepare for college (postsecondary) and career. The District offers opportunities for middle and high school students to earn college credit and credentials as well as to participate in Career and Technical Education (CTE), industry and occupational pathways and programs, and work-based learning and pre-apprenticeship.

The Academies of Louisville are a core component of the District's CTE programming and career pathways infrastructure at the high school level. The Academies are discussed in detail in the sections that follow.

Strategy and Goals

As discussed in **Chapter 1: District Leadership & Strategy**, JCPS does not have a current strategic plan. The most recent strategic plan, Vision 2020, was implemented between 2015-2020 and included several focus areas and actions related to college and career readiness for JCPS students:

- Providing relevant, career-focused experiences
- Expanding and monitoring the Academies of Louisville model
- Leveraging community partnerships for expanded student learning experiences and supports
- Developing a system infrastructure to support students in postsecondary success, also known as the Louisville Promise

Vision 2020 also referenced the following short- and long-term outcomes associated with the plans goals and strategies:

- Increased college- and career-readiness rate
- Increased college-going rate
- Increased graduation rate
- # of Academies of Louisville business partnership reports
- % of students participating in work-based experiences
- % of students with dual credit

The Jefferson County Board of Education's (JCBE) Goals and Guardrails established in 2024 do not include specific references to college and career readiness goals or metrics.

Although the District reports on college and career readiness measures, JCPS does not have any current, formal established goals or metrics in this area.

Outcome Measures

The District reported several outcomes related to college and career readiness measures in the 2025-26 Comprehensive District Improvement Plan (CDIP).⁶⁴²

JCPS reported that in 2024:

- more than 7,300 students graduated, including 4,350 from the Academies of Louisville with career pathways
- Nearly 3,000 students earned college credit through AP or dual enrollment

⁶⁴² “[Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026](https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view).” Jefferson County Public Schools. Retrieved February 25, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hl-ZaNX-dx5N9QfuM7/view>

- More than 2,000 students achieved industry certifications

The CDIP also points out that in the class of 2025:

- the average graduation rate (an average of the four- and five-year rate) increased from 88% to 89.2%
- The postsecondary readiness rate with high demand (the share of students enrolling in high-demand career fields) rose from 78.7% in 2023 to 84% for the class of 2025.

The CDIP also referenced the District's commitment to engaging community partners through the Academies of Louisville and programs like Evolve502 and the Everybody Counts initiative to "connect students with real-world experiences, college access, and career pathways."⁶⁴³

To expand on the outcomes data reported in the CDIP, the exam team conducted analysis of JCPS data from the Kentucky Department of Education (KDE) report card data. That analysis is included in the sections that follow.

MIDDLE SCHOOL PATHWAYS AND PROGRAMS

Middle School Offerings and Application Process

JCPS has over thirty middle schools and offers students two main options for middle school — resides schools and magnet schools. Elementary school students who are currently enrolled in Traditional Magnet elementary schools will be automatically enrolled in Traditional Magnet middle schools.⁶⁴⁴ Additional information on key differences between resides schools and magnet schools and the role of the Choice Zone can be found below in the Application Process section.

Middle School Explore Pathways

Explore Pathways are CTE learning experiences offered in 13 out of 28 total middle schools across the District.⁶⁴⁵ In sixth grade, students rotate through pathway offerings and then select their pathway for 7th and 8th grade. At the end of 8th grade, students complete a Defense of Learning to showcase artifacts created during their pathway. There are five Explore Pathways available to students, depending on the school. Pathways are aligned with the Kentucky Department of Education Career Clusters and include Business and Communication, Consumer Science, Engineering and Design, Healthcare Science, and Public Service.

Explore Pathways connect to the District's larger pathway strategy by providing students with early, real-world exposure to career and technical fields through project-based learning, guest speakers, and field trips.⁶⁴⁶ This early exploration helps students clarify their postsecondary interests before entering high school, allowing them to participate more intentionally in the Academies of Louisville or other programming and align their high school experiences with their long-term goals.⁶⁴⁷

Middle School Pre-Apprenticeships

JCPS offers five middle school pre-apprenticeship programs via Tech Ready Apprenticeships for Careers in Kentucky (TRACK). They include carpentry, electrical, heavy equipment, masonry, and welding. The TRACK program is a partnership between KDE and the Kentucky Office of Apprenticeship. The program is

⁶⁴³ "Jefferson County Public Schools Comprehensive District Improvement Plan for 2025-2026." Jefferson County Public Schools. Retrieved February 25, 2026. <https://drive.google.com/file/d/1kgFmR6jEfM9yb2hI-ZaNX-dx5N9QfuM7/view>.

⁶⁴⁴ "JCPS Middle School Choices." Jefferson County Public Schools. Retrieved March 25th, 2026. <https://www.jefferson.kyschools.us/page/middle-school-choices>

⁶⁴⁵ Ibid.

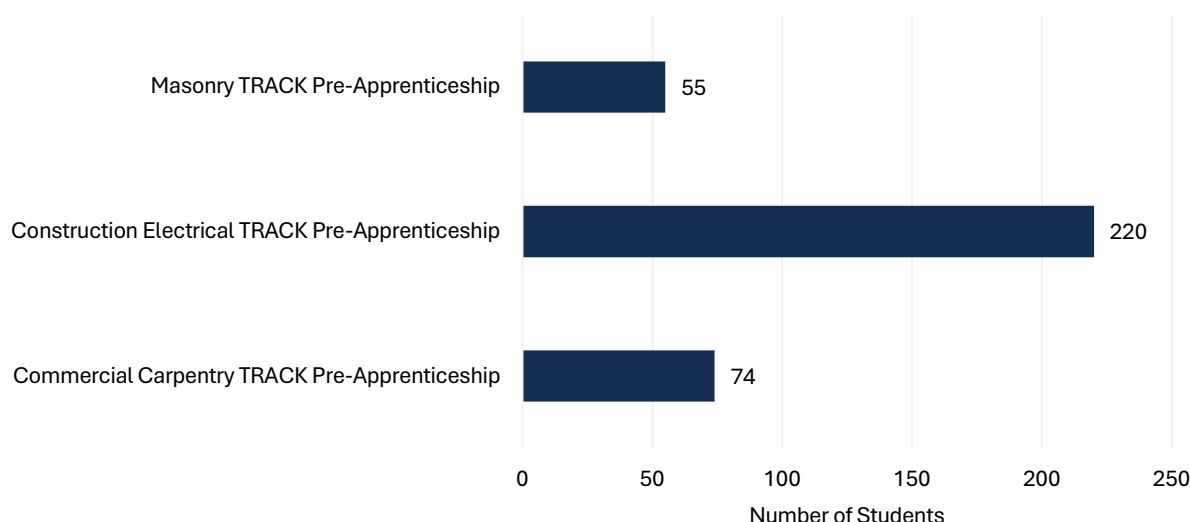
⁶⁴⁶ Ibid.

⁶⁴⁷ "Explore Expanding Middle Schoolers Career, Pathway Views." Jefferson County Public Schools. Published September 11, 2024. Retrieved March 25th, 2026. <https://www.jefferson.kyschools.us/article/1753759>

intended to create a pipeline for students to enter post-secondary apprenticeship training by providing students with career pathway opportunities starting in middle school.⁶⁴⁸

Approximately 350 students of 22,000 6th to 8th graders were enrolled in a TRACK program in 2024-25, representing 2% of the middle school student population. The Construction Electrical TRACK had the highest enrollment of all TRACK programs with 220 students or 63% of total TRACK enrollees (Figure 216).

FIGURE 216: TOTAL ACTIVE ENROLLMENT BY TRACK PRE-APPRENTICESHIP PROGRAM AREA, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

HIGH SCHOOL OFFERINGS

Application Process

JCPS offers students two main options for high school—resides schools and magnet schools:

- Resides high schools are the local high schools that students are automatically enrolled in (based on their address) unless they live in a Choice Zone or are enrolled in a traditional magnet school. All resides high schools in JCPS are Academies of Louisville. While students do not need to apply to the resides school that is associated with their address, if a student wants to enroll in a pathway that is offered at a different Academies of Louisville school, they must apply to that school.
- Magnet high schools are specialized, theme-based high schools that students must apply to. Students interested in attending magnet high schools can apply to up to two magnet schools or programs per year. Students enrolled in a traditional magnet middle school are automatically enrolled in the corresponding traditional magnet high school in their magnet pathway.⁶⁴⁹ Unlike Magnet Schools, Traditional Magnet Schools are boundary-based, so students are eligible to enter the lottery based on their home address.⁶⁵⁰

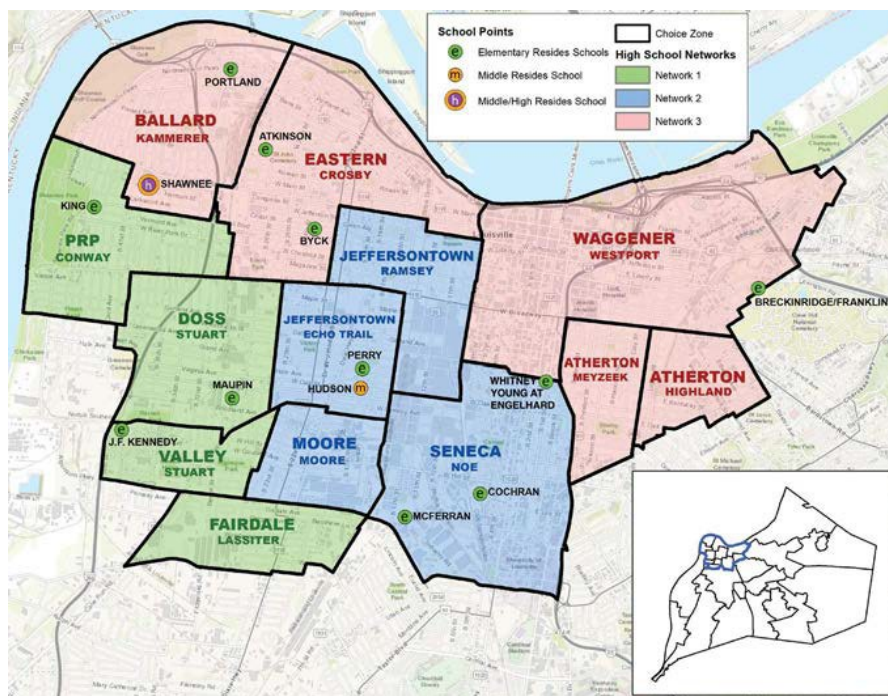
⁶⁴⁸ “[TRACK: Tech Ready Apprentices for Careers in Kentucky](https://www.education.ky.gov/CTE/cter/Pages/TRACK.aspx).” Kentucky Department of Education. Published January 27, 2026. Retrieved December 4th, 2025. <https://www.education.ky.gov/CTE/cter/Pages/TRACK.aspx>

⁶⁴⁹ “[2026-27 School Year: High School Choices](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dadb4b5/High-Choices.pdf?disposition=inline).” Jefferson County Public Schools. Retrieved December 4, 2025. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dadb4b5/High-Choices.pdf?disposition=inline

⁶⁵⁰ “[Choices Guide](https://www.jefferson.kyschools.us/page/choices-guide).” Jefferson County Public Schools. <https://www.jefferson.kyschools.us/page/choices-guide>. Retrieved December 4, 2025.

The Choice Zone is in the northwest area of Jefferson County (Figure 217). Students living in the Choice Zone are required to select either their “close to home” or “far-away” reside high school, as they are not automatically enrolled. Students in the Choice Zone are permitted to change their school selection annually. Students living in the Choice Zone can also apply to magnet high schools.

FIGURE 217: JEFFERSON COUNTY PUBLIC SCHOOLS CHOICE ZONE MAP



Source: Jefferson County Public Schools website.

Academies of Louisville

The Academies of Louisville schools offer all students career connected learning pathways, based on the Ford Next Generation Learning (NGL) Model. The Ford NGL framework includes transforming:

- Teaching and learning
- Culture, systems, and structures of schools
- Partnerships between schools and community

The model connects high school education with local industry needs, career-themed learning communities and personalized pathways, workplace skills, and college credits to prepare students for the 21st century workforce.⁶⁵¹ The majority of JCPS high school students attend Academies of Louisville:

- In 2023-2024, there were 23,727 students enrolled in the Academies of Louisville, representing 70% of all JCPS high schools students.⁶⁵²
- In 2024-25, there were 23,894 students enrolled in Academies of Louisville, representing 72% of JCPS high school students.

⁶⁵¹ “The Ford NGL Framework.” Ford Next Generation Learning. Retrieved March 25, 2026. <https://fordngl.com/>

⁶⁵² “Report Card Dashboard – Datasets.” Kentucky Department of Education. Retrieved March 20, 2026. <https://reportcard.kyschools.us/data-download?pid=c340f7d5-efbd-5fb8-cab8-3a128835f84c>

As highlighted in Figure 218, students explore all pathways offered at their Academy of Louisville during their freshman year before selecting one Academy to pursue for the remainder of their high school career.⁶⁵³ The Academies of Louisville differ from a traditional vocational school model in that all of Academy students' core courses are taught through the lens of their chosen pathway.⁶⁵⁴ Additionally, most Academies have their own principal or assistant principal and counselor.⁶⁵⁵

FIGURE 218: STUDENT JOURNEY THROUGH ACADEMIES OF LOUISVILLE

PHASE	Description
8 th Grade Transition	In 8 th grade, all students participate in the Junior Achievement Inspire career fair. At this event, students explore different careers available in Louisville by connecting directly with employers. ⁶⁵⁶
Freshman Academy	In Freshman Academy, students explore all Academy pathways at their school at the end of their freshman year. Students elect one Academy pathway to pursue for the remainder of high school.
Academies (10 th – 12 th Grade)	Students take industry-related courses in their Academies (taught by industry experts) and develop a postsecondary transition plan. In 11 th and 12 th grade, students participate in internships through the Mayor's SummerWorks, a program that supports young people (ages 16-21) in exploring careers of interest and identifying summer jobs in the Greater Louisville region. ⁶⁵⁷
Graduation & Beyond	Students graduate from Academies of Louisville with college credit hours, industry credentials, and/or work experience.

Source: Jefferson County Public Schools website.

In addition to the student journey outlined above, Academy of Louisville students also have opportunities to directly engage with industry partners through internships, job shadowing, field trips, and networking.⁶⁵⁸

Each Academy of Louisville offers students two or three career-themed Academy options (Figure 219). Each Academy then offers two to six specialized pathways for students to choose from. For example, the STEM Academy at Ballard High School offers the following pathways: Aerospace Engineering, Allied Health, Automation Engineering, Biomedical Sciences, Civil Engineering, and Pre-Nursing.⁶⁵⁹

⁶⁵³ "Academies of Louisville." Jefferson County Public Schools. Retrieved March 20, 2026. <https://www.jefferson.kyschools.us/page/academies-of-louisville>

⁶⁵⁴ "About the Academies of Louisville." The Academies of Louisville Alliance. Retrieved March 20, 2026. <https://www.aofalliance.org/about-the-academies-of-louisville>

⁶⁵⁵ "Academies of Louisville." Jefferson County Public Schools. Retrieved March 11, 2026. <https://www.jefferson.kyschools.us/page/academies-of-louisville>

⁶⁵⁶ "JA Inspire to Hire 2025." Junior Achievement of Kentuckiana. Retrieved March 11, 2026. <https://kentuckiana.ja.org/events/ja-inspire-to-hire-2025>

⁶⁵⁷ "SummerWorks FAQ." SummerWorks. Retrieved March 11, 2026. <https://www.summerworks.org/faq>

⁶⁵⁸ "Academies of Louisville." Jefferson County Public Schools. Retrieved March 11, 2026. <https://www.jefferson.kyschools.us/page/academies-of-louisville>

⁶⁵⁹ "Academies and Pathways." The Academies of Louisville. Retrieved March 11, 2026. <https://drive.google.com/file/d/1KiKu1sprnz6nJcNh7UFxzyMXf39J7QMa/view>

FIGURE 219: ACADEMIES OF LOUISVILLE PROGRAM OFFERINGS BY SCHOOL

JEFFERSON COUNTY PUBLIC SCHOOLS HIGH SCHOOL		Academies Offered
Academy @ Shawnee		• Aviation, Interactive Media Arts, and Manufacturing (A.I.M) Academy • Health and Human Services • Global Pathway: Navy Junior Reserve Officers Training (JROTC)
Atherton High School		• Engineering Academy • Health Science Academy • Media Arts Academy
Ballard High School		• Business Services Academy • Media Arts Academy • STEM Academy
Doss High School		• Business and Education Academy • Health Sciences Academy • Technology, Engineering, and Construction Academy (TEC)
Eastern High School		• Business Academy • Computer Science and IT Academy • Service and Design Academy
Fairdale High School		• Civil Service Academy • Global Service Academy • Public Service Academy
Fern Creek High School		• Communications Academy • Education, Community, and Service Academy • Engineering, Computer Science, and Skilled Trades Academy
Iroquois High School		• Builder's Apprenticeship Academy • Create Academy • Human Services Academy
Jeffersontown High School		• Build and Design Academy • Business and Health Science Academy
Marion C. Moore School		• Community Academy • Health Science Academy • STEM Academy
Pleasure Ridge Park High School		• Business and Communications Academy • Health Sciences Academy • Manufacturing, Engineering, and Design Academy
Seneca High School		• Agriscience and Leadership Academy • Health Science Academy • Innovate Academy
Southern High School		• Automotive Service Academy • Business Leadership Academy • Manufacturing, Engineering, Technology, Allied Health, and Leadership (METAL) Academy
Valley High School		• Business and Industry Academy • Health Science Academy

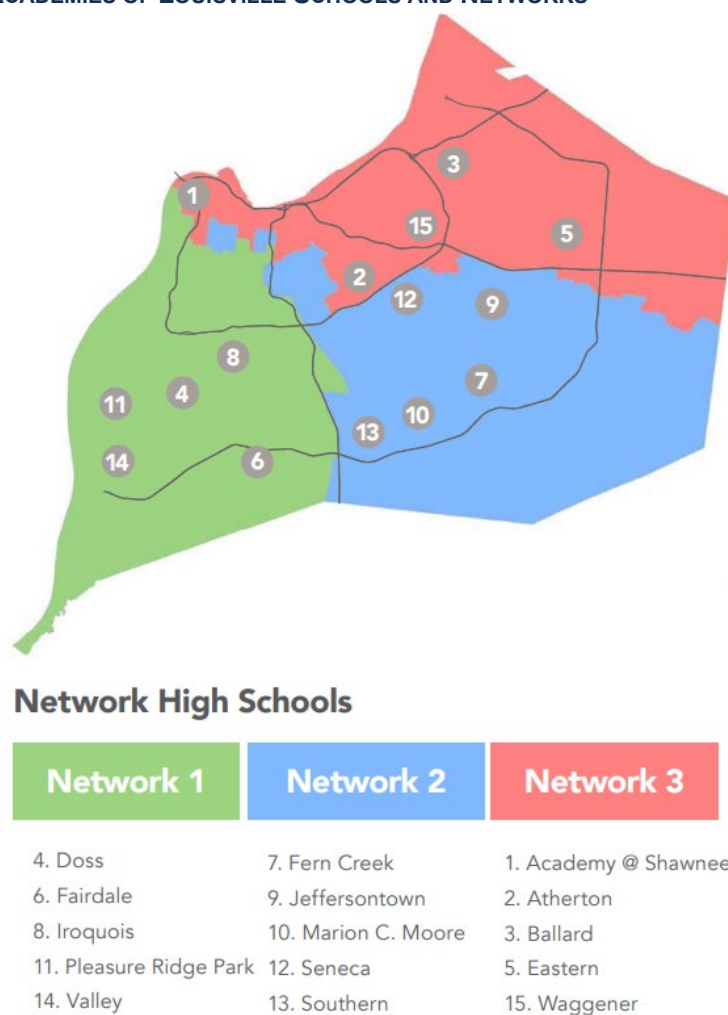
	Global Pathway: Navy Junior Reserve Officers Training (JROTC)
Waggener High School	- Health Science Academy - IT and Law Academy

Source: Academies of Louisville Alliance website.

If students wish to pursue a pathway not offered at their local Academy of Louisville, they can apply to one of the other Academy of Louisville schools in their network (Figure 220). Students must have a 2.0 GPA to apply to a school other than their reside school and are selected via lottery.⁶⁶⁰

Of the pathway programs offered across the District, nine are offered at only one school. Students interested in pursuing these pathways can apply regardless of their location in the District.

FIGURE 220: MAP OF ACADEMIES OF LOUISVILLE SCHOOLS AND NETWORKS



Source: Jefferson County Public Schools website.

⁶⁶⁰ "2026-27 School Year: High School Choices." Jefferson County Public Schools. Retrieved March 12, 2026. https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dacb4b5/High-Choices.pdf?disposition=inline

Academies of Louisville Governance Structure

The Academies of Louisville model is managed by a governance structure that engages a wide range of stakeholders. District administrators, school-based leaders and teachers, business partners, students, and other staff inform the development of experiences for the Academies model, grow the Academies, and sustain them.

Guiding Team

The Guiding Team provides overall strategic direction and accountability for the Academies of Louisville model, convenes quarterly, and focuses on setting goals around business partnerships, student experiences, and communicating success stories. Three school-based staff representatives and one Central Office staff representative serve on the Guiding Team, along with community and business partner organizations. The Guiding Team draws on feedback and model development work from the JCPS Vision Team, the Student Ambassador Leadership Team, business partners, and other work groups to inform strategy for the Academies of Louisville.⁶⁶¹

JCPS Vision Team

The JCPS Vision Team includes approximately 45 representatives, including two representatives for each Academies of Louisville schools that includes an administrator and a teacher, plus District-level staff representation and Explore Coaches. The Vision Team collaborates on Academies model development and what the Academies experience looks like. Staff who work with the Vision Team reported a goal of the model development is to have consistency across the schools so that all students are getting the same experience.

Student Ambassador Leadership Team

The Student Ambassador Leadership Team includes two representatives from each school who meet every six weeks. Like the JCPS Vision Team, the Student Ambassador Leadership Team also contributes to writing experience guides and bringing student perspective and feedback to the Guiding Team.

Other Key Groups

Business partners engage with specific Academies of Louisville schools and offer a range of experiential learning opportunities. Work groups focused on various topics also meet regularly to collaborate around growth and sustainability for the Academies model. These groups provide feedback to the overarching Guiding Team.

Stakeholder Perceptions of the Academies of Louisville

In focus groups, interviews, and survey data, families, school-based staff, and students shared appreciation for the Academies of Louisville offering students an opportunity to pursue their specialized postsecondary interests, often highlighting the number of program options available to students. Non-school-based staff and JCPS Board members similarly noted the Academies of Louisville as a strength of the district, highlighting the ways that Academies of Louisville allow the integration of coursework with career interests.

Some stakeholders expressed concerns regarding students pursuing one specific career pathway through the Academies of Louisville so early in their academic career and noted that pathways limited students from taking other elective coursework.

Partnerships

Finding	
14.1	JCPS has a decentralized model and lacks systems to coordinate partnership development, with both internal staff and external organizations managing partnerships on behalf of JCPS.

⁶⁶¹ “Academies Governance Structure: Key Groups.” The Academies of Louisville. March 12, 2026. [PDF].

District Staff Partner Engagement

JCPS engages with a variety of partners — including workforce, education, business, and community organizations — in support of providing students with experiential learning and growth opportunities. Much of this work is centered around expanding student opportunities for work-based learning, dual credit, and other career readiness experiences. JCPS has an extensive network of community and industry partners. As of July 1, 2025, the Academies of Louisville partnership list included approximately 236 partners, spanning a wide range of industries and types of organizations.

In focus groups, staff reported that as many as ten JCPS staff across the District have a component of their job that includes community engagement, but are siloed and do not have collaboration or a united strategy driven by District leadership. Staff members perceived that this disparate activity engaging partners has resulted in inequities for schools, where some schools have multiple strong partnerships with outside organizations and other schools have none. Staff reported there is no centralized database or way of knowing which schools or staff members have relationships with industry partners and other community organizations.

Academies of Louisville Alliance

The Academies of Louisville Alliance is a partnership created to advance and scale the Academies of Louisville by providing dedicated staffing and resources to strengthen connections between schools, businesses, and the regional workforce system. Launched in late 2023, the Alliance emerged from a shared commitment among business leaders, JCPS, KentuckianaWorks, and Greater Louisville Inc. (GLI) to elevate the initiative into a national model for urban districts and to support Louisville's talent pipeline.⁶⁶² Funded by the Gheens Foundation and MacKenzie Scott grant funds from Jefferson County Public Education Foundation (JCPEF), the Alliance is staffed by eight KentuckianaWorks and GLI staff who function as a team of business-facing partnership and communications coordinators to support the Academies. Housed within KentuckianaWorks, with one position supported by GLI, the Alliance now provides coordinated support for 15 high schools, more than 200 business partners, and over 19,000 students participating in the Academies of Louisville.⁶⁶³ Alliance staff also support business partners.

The distinction between what JCPS staff and Alliance staff manage as it relates to partner engagement was not clear to the exam team.

Recommendations	
14.1.a	JCPS should review all roles Districtwide that include community partner engagement as a component of the job description and identify systems to improve efficiency, communication, collaboration, and coordination amongst staff and outside agencies (including the Academies of Louisville Alliance) that engage with partners.
14.1.b	JCPS should develop or procure a centralized tracking system for partner relationship management that can be shared with outside agencies supporting partnership development, such as the Academies of Louisville Alliance.
14.1.c	In coordination with the Academies of Louisville Alliance, JCPS should identify gaps across schools related to partner engagement and develop strategies and goals for targeted partner engagement and expansion of student opportunities with partners.

Magnet Schools

In addition to the 15 Academies of Louisville which all follow a career pathway structure, JCPS has eight magnet high schools, each with different themes and specialized programming (such as STEM, performing arts, and international studies). Unlike the Academies of Louisville, students must apply to attend magnet

⁶⁶² “[The Academies of Louisville Alliance: Powering Bold Goals with a New Team](https://www.aofalliance.org/news/academies-of-louisville-announce-new-team).” The Academies of Louisville Alliance. Retrieved February 27, 2026. <https://www.aofalliance.org/news/academies-of-louisville-announce-new-team>

⁶⁶³ Ibid.

high schools. Students are allowed to submit one application each year applying for up to two magnet schools or programs. Students who are enrolled in magnet middle schools do not need to apply and are automatically enrolled in the corresponding magnet high school.⁶⁶⁴ Enrollment at Butler Traditional and Louisville Male are contingent on a students' residential address. Both of these schools use a lottery system to select applicants.

Magnet schools also offer unique opportunities for students to complete career pathways aligned to their career interests. During the 2024-25 school year, 71.5% of magnet high school students were enrolled in a pathway (compared to 72.4% of students at Academies of Louisville). Figure 221 outlines the Career Pathways offered at magnet high schools:

FIGURE 221: CAREER PATHWAYS OFFERED AT JEFFERSON COUNTY PUBLIC SCHOOLS MAGNET HIGH SCHOOLS

MAGNET HIGH SCHOOL	Career Pathways Offered	
Butler Traditional	• Allied Health • Army JROTC • Automation Engineering • Information Support and Services	• Marketing • Network Security • Pre-Law Studies • Teaching and Learning
Central High School Magnet Career Academy	• Additive Manufacturing • Cyber Engineering • Dental Assisting • Management Entrepreneurship • Marketing	• Navy JROTC • Patient Care Technician • Pre-Law Studies • Pre-Med • Teaching and Learning • Veterinary Assistant
Dr. Grace James Academy of Excellence	• Computer Programming • Cyber Engineering • Data Science	• Mechanical Engineering • PLTW Biomedical Sciences
duPont Manual	• Allied Health • Computer Programming • Consumer and Family Science	• Fashion and Interior Design • Food Science and Dietetics • Mechanical Engineering
J. Graham Brown	• Computer Programming	
Louisville Male	• Accounting • Army JROTC • Computer Programming • E-Commerce	• Management Entrepreneurship • Mechanical Engineering • PLTW Biomedical Sciences • Teaching and Learning
Western	• Computer Programming • Culinary and Food Sciences • Data Science/Public Health	• Digital Design and Game Development • Graphic Design • Management Entrepreneurship

⁶⁶⁴ “[2026-27 School Year: High School Choices](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dacb4b5/High-Choices.pdf?disposition=inline).” Jefferson County Public Schools. Retrieved March 25, 2026.
https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dacb4b5/High-Choices.pdf?disposition=inline

W.E.B DuBois Academy

- Aerospace Engineering
- Aircraft Maintenance Technician

- Marketing

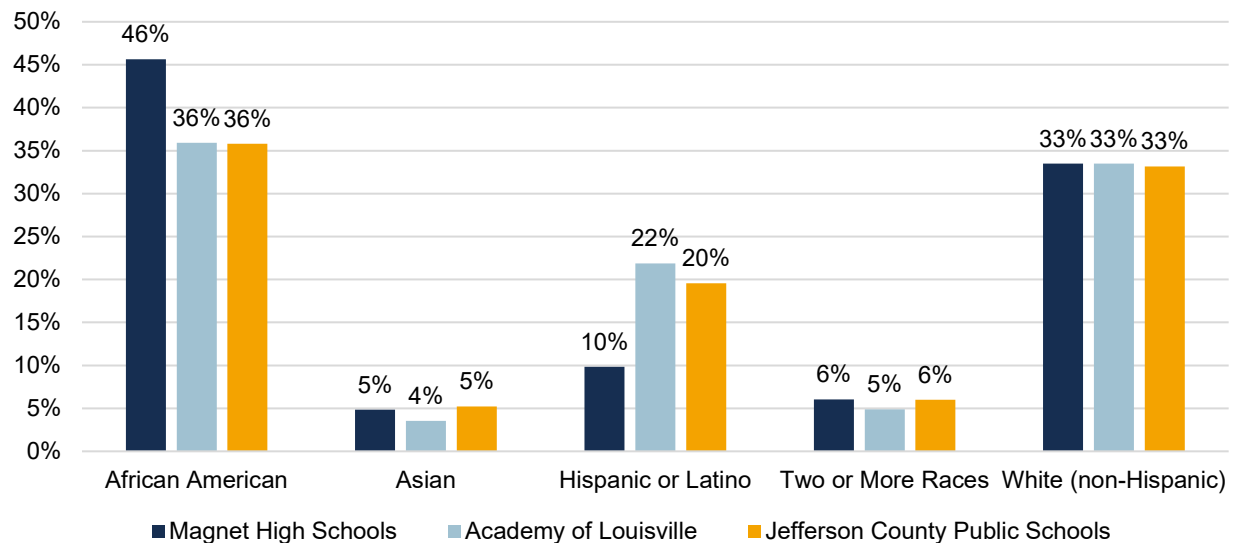
Source: Jefferson County Public Schools website.

HIGH SCHOOL ENROLLMENT DEMOGRAPHICS

Figure 222 shows the student race/ethnicity distribution across the District's various high school types.

- Hispanic or Latino students are more likely to be enrolled in the Academies of Louisville and less likely to be enrolled in magnet high schools.
- African American students represent a larger portion of students enrolled in magnet schools compared to Academies of Louisville and the JCPS districtwide student population.
- White (non-Hispanic), Asian and students of two or more races are proportionally enrolled across the District.

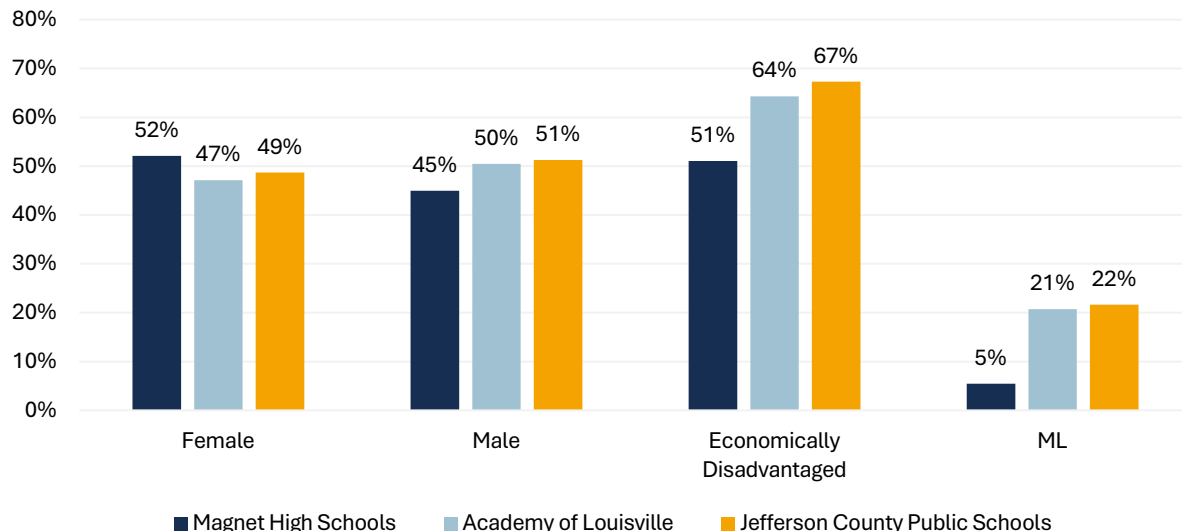
FIGURE 222: PERCENTAGE OF STUDENTS BY RACE/ETHNICITY IN MAGNET HIGH SCHOOLS, ACADEMIES OF LOUISVILLE, AND DISTRICTWIDE, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools CASCADE Data Portal.

Across additional demographic characteristics, Academies of Louisville mirror magnets and districtwide trends (Figure 223). However, in magnet high schools, male students, economically disadvantaged students, and multilingual learners are underrepresented compared to the district population.

FIGURE 223: PERCENTAGE OF STUDENTS BY DEMOGRAPHIC IN MAGNET HIGH SCHOOLS, ACADEMIES OF LOUISVILLE, AND DISTRICTWIDE, 2024-25 SCHOOL YEAR



Source: Jefferson County Public Schools CASCADE Data Portal.

CAREER PATHWAYS

Pathway Enrollment

Across the magnet schools and Academies of Louisville in the resides schools, there are 125 career and technical education (CTE) pathways offered to JCPS students. Pathways combine coursework and career training in specific areas to prepare students for future careers.

Pathway Alignment with In-Demand Sectors

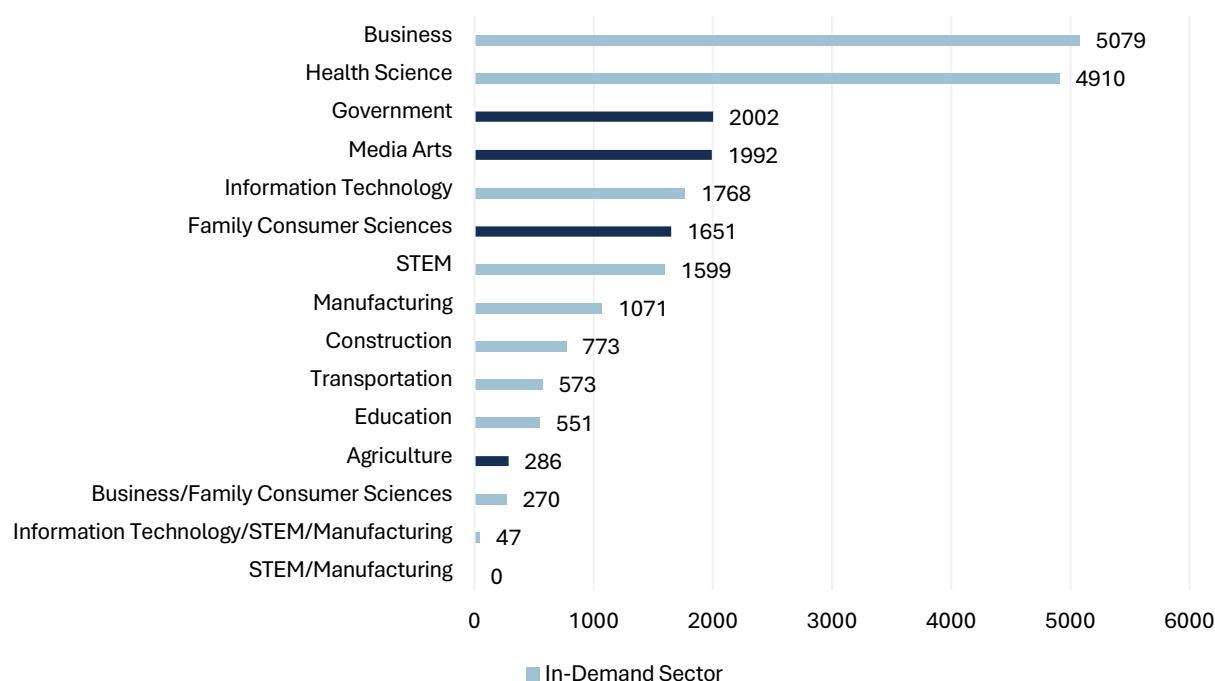
There is alignment between in-demand sectors identified by Kentucky Workforce Innovation Board (KWIB) and JCPS student enrollment by career pathway program area. Kentucky's top five in-demand sectors identified by KWIB include⁶⁶⁵:

- Healthcare
- Manufacturing and Logistics
- Construction
- Education
- Professional, Scientific, and Technical Services

All five of the in-demand sectors identified by KWIB are represented as pathway options for students at JCPS (as highlighted in light blue in Figure 224). Three out of the top five pathways with the highest JCPS enrollment align with the state's in-demand sectors, representing strong alignment between JCPS CTE pathways and state workforce needs. In focus groups, staff leadership over CTE and pathways expressed the importance of student enrollment in pathways that align with in-demand sectors, indicating the District closely monitors and prioritizes this alignment but, importantly, without restricting a student's interest in another career path.

⁶⁶⁵ "Kentucky's Top Five In-Demand Sectors." Kentucky Workforce Innovation Board. Retrieved March 25, 2026. <https://kwib.ky.gov/About/Pages/Kentuckys-Top-Five-In-Demand-Sectors.aspx>

FIGURE 224: TOTAL ACTIVE ENROLLMENT BY PATHWAY AREA, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

FAMILY AND STUDENT RESOURCES

Observation	
14.2	The District does not have an updated repository of college and career readiness resources on the District website that is available to all families and students.

Individualized Learning Plans

All students are required by 704 KAR 3:305 to complete an Individualized Learning Plan (ILP) focused on career exploration and related to postsecondary education and training needs.⁶⁶⁶ JCPS staff reported using a system called Pathful for student ILPs. All 6-12 schools have access to Pathful. According to staff, one or more counselors staff every middle and high school and support the ILP process.

High School Choice Resources

On the JCPS website, under “Students and Families,” there are documents outlining Elementary, Middle, and High School Choices. These documents are available in English, Arabic, Kinyarwanda, Nepali, Somali, Spanish, and Swahili.

The “High School Choices” document outlines the different types of high schools in JCPS, including key differences between magnets and Academies of Louisville. It also includes information about the magnet application process and the Choice Zone. Additionally, the “High School Choices” document includes a

⁶⁶⁶ “[Individual Learning Plan](https://www.education.ky.gov/educational/compschcouns/ILP/Pages/default.aspx).” Kentucky Department of Education. Published February 24, 2026. Retrieved March 9, 2026. <https://www.education.ky.gov/educational/compschcouns/ILP/Pages/default.aspx>

profile for each high school. At the end of the document, there is a “Career Pathway Quick Reference Guide,” which lists career pathways offered at the Academies of Louisville by network.⁶⁶⁷

Graduation, College, and Career Center

On the JCPS website under “Students and Families,” there is a section entitled “Graduation, College, & Career Center.” This section houses information on the following topics:

- Graduation requirements
- Dropout alternatives
- Individual learning plan (ILP)
- Career and Technical Education (CTE)
- College credit (listed as “coming soon”)
- Searching for scholarships (inactive page)
- Military options
- NCAA eligibility
- ACT
- Transcripts
- Planning for college (inactive page)
- KHEAA

The “College Credit,” “Searching for Scholarships,” and “Planning for College” pages are all either inactive or listed as “coming soon,” limiting the effectiveness of these resources. Individual high schools in the District publish college and career resources on their respective school sites, including information on college applications, college tours,⁶⁶⁸ Kentucky scholarships, and college admissions testing prep.⁶⁶⁹

Additionally, on the JCPS webpage for Students and Families under “Resources,” there is a section entitled “College & Career Readiness.” This page lists and links 61 colleges and universities and five beauty schools, many of which are in Kentucky. The only other information included on the page is JCPS Help contact information (email and phone number).

Recommendation	
14.2.a	JCPS should update the JCPS Students and Families webpage with current college and career readiness resources and links to serve as a central repository for this information.

Perceptions of JCPS College and Career Readiness

As highlighted in Figure 225, around 80% of student and family respondents agreed that JCPS is preparing them or their student to succeed in the college or career of their choice. Similarly, the majority of student and family respondents (84% and 73%, respectively) agreed that they (or their students) can participate in career-related learning activities.

⁶⁶⁷ “[2026-27 School Year: High School Choices](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dacb4b5/High-Choices.pdf?disposition=inline).” Jefferson County Public Schools. Retrieved March 12, 2026.

https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/4298/Jcps/3fb674ce-d190-405a-b2ee-4e8d2dacb4b5/High-Choices.pdf?disposition=inline

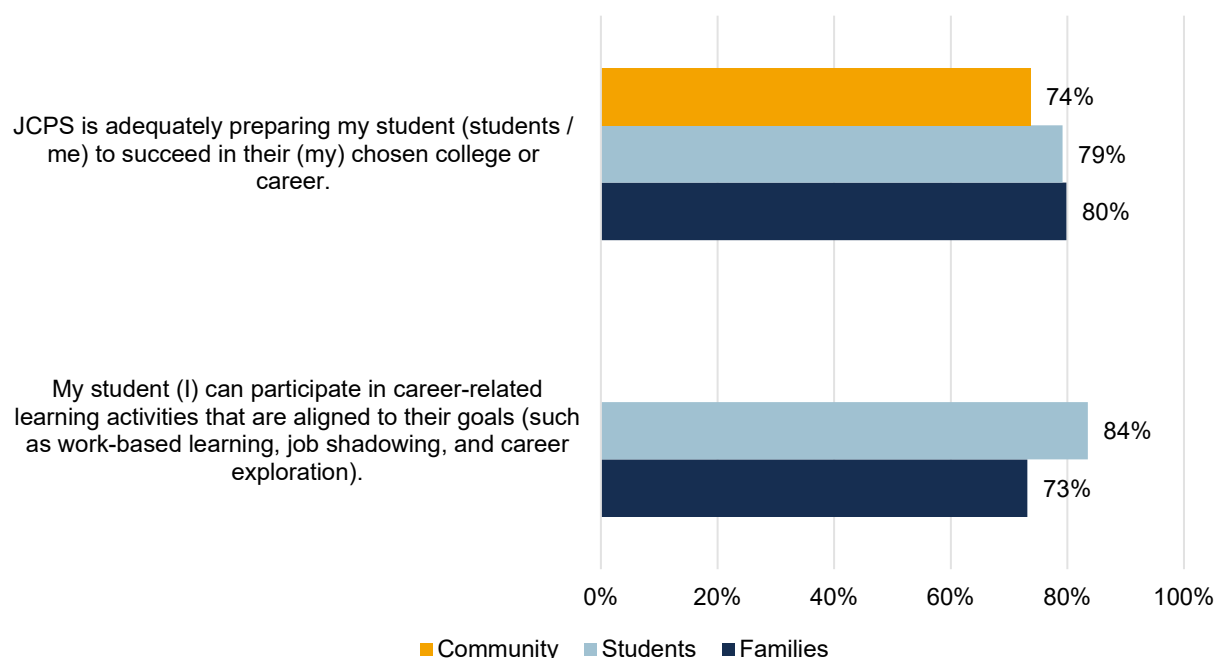
⁶⁶⁸ “[Central High Magnet Academy: College Applications](https://www.jefferson.kyschools.us/o/centralhs/page/college-applications).” Central High Magnet Academy. Retrieved March 24, 2026.

<https://www.jefferson.kyschools.us/o/centralhs/page/college-applications>

⁶⁶⁹ “[Eastern High School Library: College Resources](https://jcpsky.libguides.com/c.php?g=76173&p=1111871).” Jefferson County Public Schools. Retrieved March 24, 2026.

<https://jcpsky.libguides.com/c.php?g=76173&p=1111871>

FIGURE 225: COMMUNITY, STUDENT, AND FAMILY PERCEPTIONS OF JEFFERSON COUNTY PUBLIC SCHOOLS PREPARING STUDENTS FOR COLLEGE/CAREER



Source: Special Examination Survey.

In the exam survey free response questions, families and students expressed mixed opinions about AP and dual credit offerings at JCPS high schools, with some highlighting these offerings as a strength and others noting that their school or their students' school lacks sufficient AP/dual credit offerings. Many school-based staff highlighted dual credit and AP offerings and students' preparedness for postsecondary education as a strength of the District. JCPS families expressed mixed perceptions regarding how well JCPS is preparing their student(s) for college. Some JCPS families commended rigorous course offerings and career pathway options while other families expressed concerns regarding their students' readiness for college.

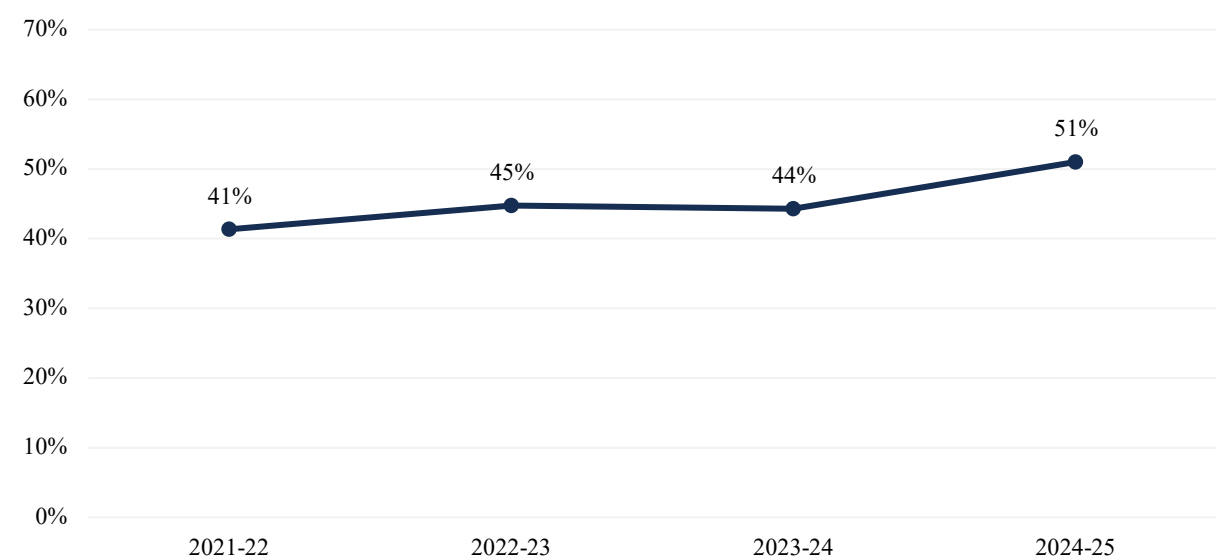
ADVANCED COURSEWORK

JCPS students can participate in advanced coursework through Advanced Placement (AP) courses and dual credit courses. Earning qualified scores on advanced course exams can result in college-level credit or placement, benefiting students by reducing the time and expense of completing a college degree. AP course offerings vary by school.

Advanced Placement

Students who participate in AP courses and earn a qualifying score on the AP exam can earn college-level credit or placement. The percentage of high school students participating in AP coursework has remained between 19%-20% from 2021-22 to 2024-25. The percentage of AP course-takers earning a qualifying score is highlighted in Figure 226. Fifty-one percent of students enrolled in AP courses in 2024-25 earned a qualifying AP exam score, an increase from 41% in 2021-22.

FIGURE 226: PERCENT OF STUDENTS ENROLLED IN AP COURSES EARNING A QUALIFYING AP SCORE, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

Dual Credit

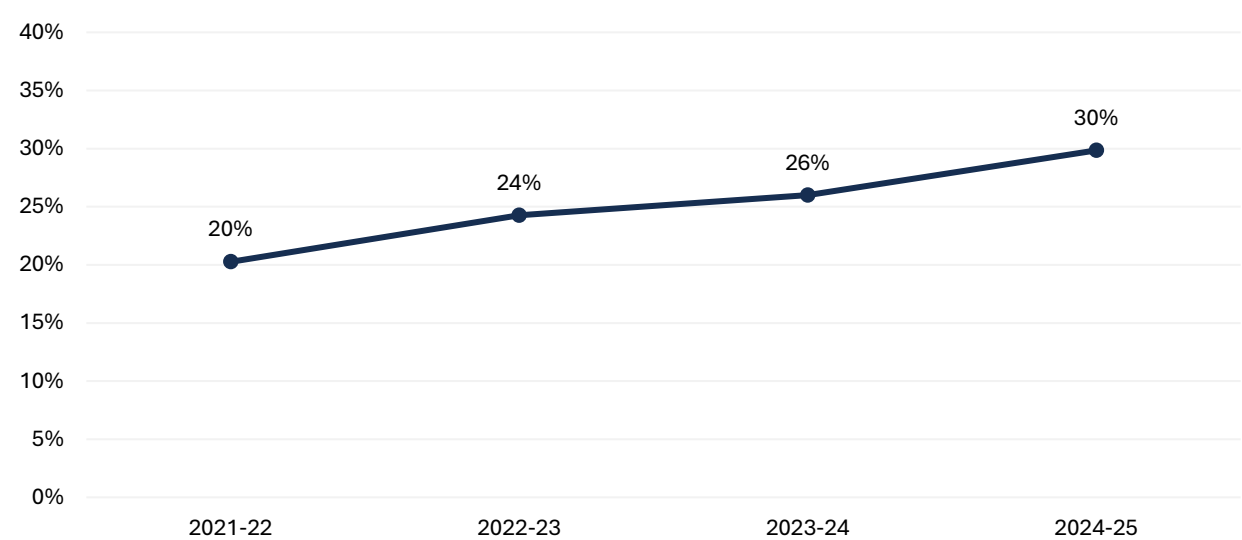
Programming

Students can earn high school and college credit simultaneously through dual credit opportunities in high schools across the District. In 2024-25, 27 high schools offered dual credit out of 30 total high schools in the District. Dual credit opportunities differ by high school.

Enrollment in Dual Credit Courses

The percentage of high-school students enrolled in dual credit courses has increased by ten percentage points from 20% in 2021-22 to 30% in 2024-25 (Figure 227).

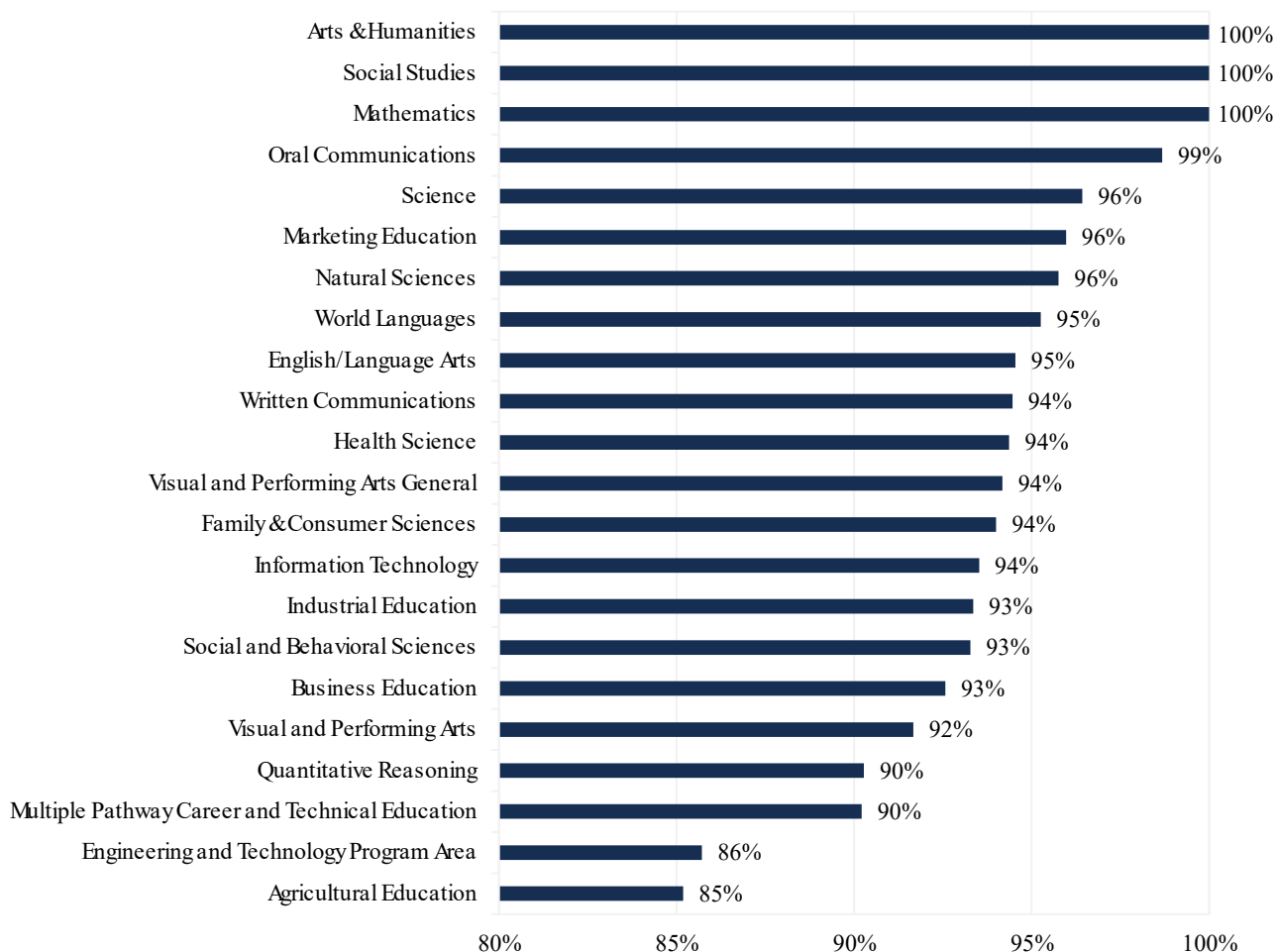
FIGURE 227: JEFFERSON COUNTY PUBLIC SCHOOLS DUAL CREDIT STUDENT ENROLLMENT, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

Figure 228 reflects the percentage of students who completed a dual credit course who earned a qualifying score by subject in 2024-25. Students can enroll in more than one dual credit course, so they may be counted more than once in the following chart. One hundred percent of students who took courses in Arts & Humanities, Social Studies, or Mathematics earned a qualifying score. Subjects with relatively lower passing rates were Engineering and Technology (86%) and Agricultural Education (85%). Overall, on average, 94% of students who completed the dual credit course earned a qualifying score.

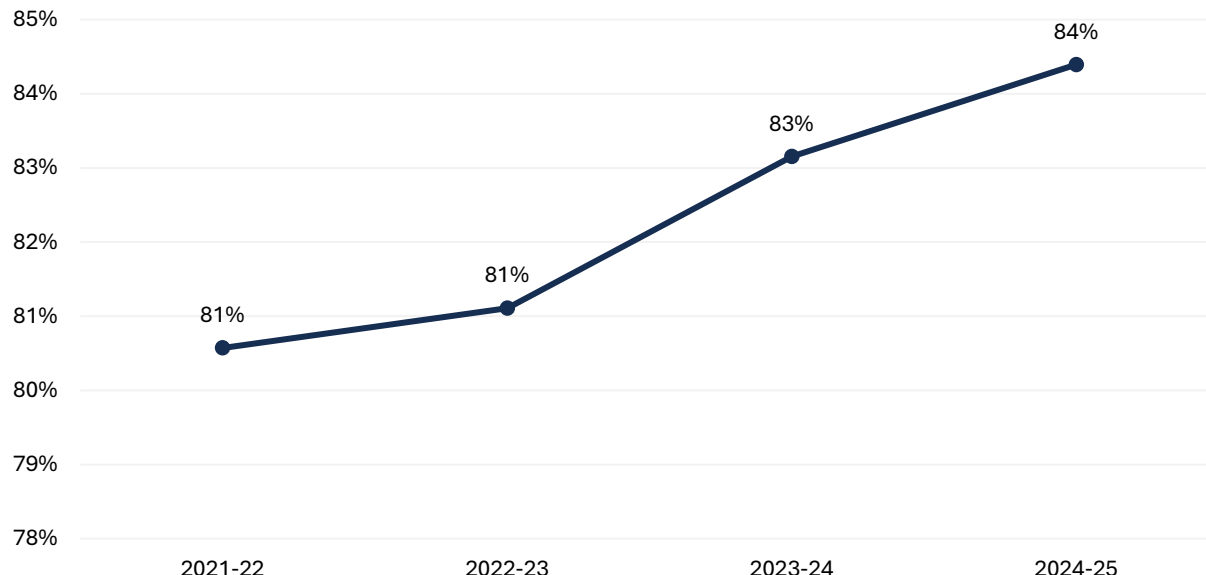
FIGURE 228: PERCENTAGE OF DUAL CREDIT COURSE-COMPLETERS WHO EARN A QUALIFYING SCORE, BY SUBJECT, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Students can earn college credit for dual credit courses if they obtain a qualifying grade of a “C” or better in the course. As shown in Figure 229, in 2025-25, 84% of students enrolled in at least one dual credit course earned a qualifying score in 2024-25. This represents a three-percentage point increase from 2021-22, when 81% of students enrolled in dual credit coursework earned a qualifying score.

FIGURE 229: PERCENTAGE OF STUDENTS ENROLLED IN DUAL CREDIT COURSEWORK WHO EARNED A QUALIFYING SCORE, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

GRADUATE OUTCOMES

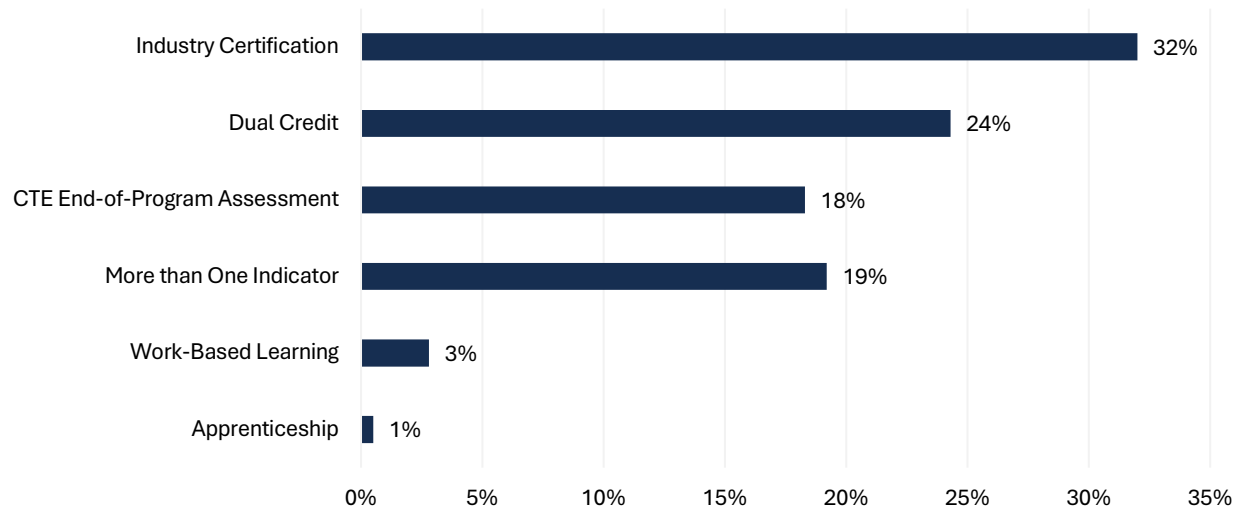
Certification and Credit Outcomes

Career readiness indicators include completion of an industry certification, CTE end-of-program assessment (EOP), apprenticeship, dual credit, work-based learning, or more than one indicator. Career readiness is one component of post-secondary readiness, as discussed in the next section.

Figure 230 shows that 32% of students earned an industry certification, 24% earned dual credit, and 18% completed a CTE end-of-program assessment in 2024-25. Forty-four percent of 12th grade students did not earn a career readiness indicator.

- EOPs are designed by KDE and employer feedback to measure student mastery of the content of the career pathway. EOPs have statewide articulated college credit associated with successful completion. JCPS offers EOPs for 27 pathways, such as accounting, civil engineering, and marketing.
- Industry certifications were offered for 121 CTE student opportunities, including welding, Adobe, and early childhood education.
- An apprenticeship was offered for the five TRACK programs, including Welding, Masonry, Carpentry, Electrical, Heavy Equipment.

FIGURE 230: PERCENTAGE OF STUDENTS IN THE TWELFTH GRADE COHORT EARNING EACH CAREER READINESS INDICATOR, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.
Note: Students may be counted under several criteria. If a student achieves multiple indicators, they are included in the “More than One Indicator” category as well as each individual indicator earned.

Postsecondary Readiness

Finding	
14.3	While postsecondary readiness rates have increased in the District, there continue to be postsecondary readiness gaps for African American and Hispanic/Latino students, as well as English Learners, economically disadvantaged students, and students with disabilities.

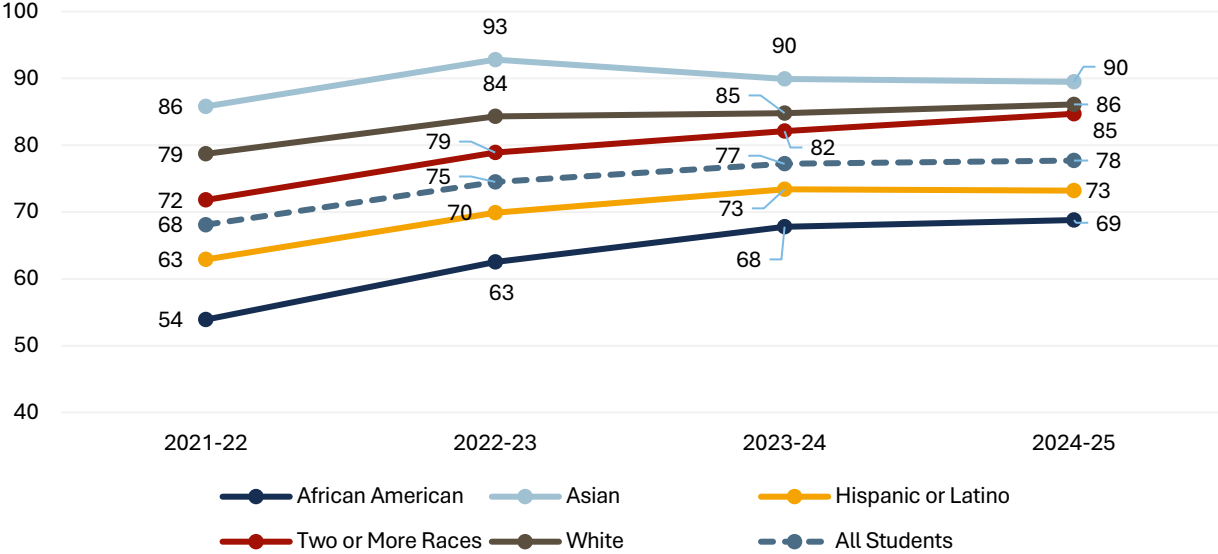
According to Ford Next Generation Learning, since the inception of the Academies of Louisville in 2017, students’ postsecondary readiness scores in JCPs have increased from 50 to 78 points.⁶⁷⁰ Postsecondary readiness measures students’ attainment of the necessary knowledge and skills to successfully transition to postsecondary pathways. As defined by KDE, the indicator summarizes both current-year readiness status and changes in performance over time. High school students demonstrate postsecondary readiness by earning a diploma or, if classified as 12th grade non-graduates, by meeting at least one criterion of academic or career readiness. Postsecondary readiness scores are reported on a 0–100 scale and reflect overall readiness performance and growth. A summary of the data in Figure 231 is listed below:

- Postsecondary readiness among all high school students has increased by ten points from a score of 68 in 2021-22 to 78 in 2024-25, with gains across all demographic groups.
- African American students demonstrated the greatest increase in postsecondary readiness over the past four years, from 54 points in 2021-22 to 69 points in 2024-25 — a 15-point jump.
- Postsecondary readiness among students identifying as two or more races increased by 13 points, while readiness among Hispanic/Latino students rose by ten points.
- Students identifying as white, Asian, or two or more races consistently scored above the districtwide scores for all students.

⁶⁷⁰ Delgado, Jessica. “[How the Academies of Louisville Are Elevating Their Story](https://fordnigl.com/how-the-academies-of-louisville-are-elevating-their-story/).” Ford Next Generation Learning. Published January 7, 2025. Retrieved March 11, 2026. <https://fordnigl.com/how-the-academies-of-louisville-are-elevating-their-story/>

While the above improvement across the district is commended, it is still noted, as shown in Figure 231, that the scores for Hispanic/Latino and African American students remain below the districtwide postsecondary readiness indicator score for all students.

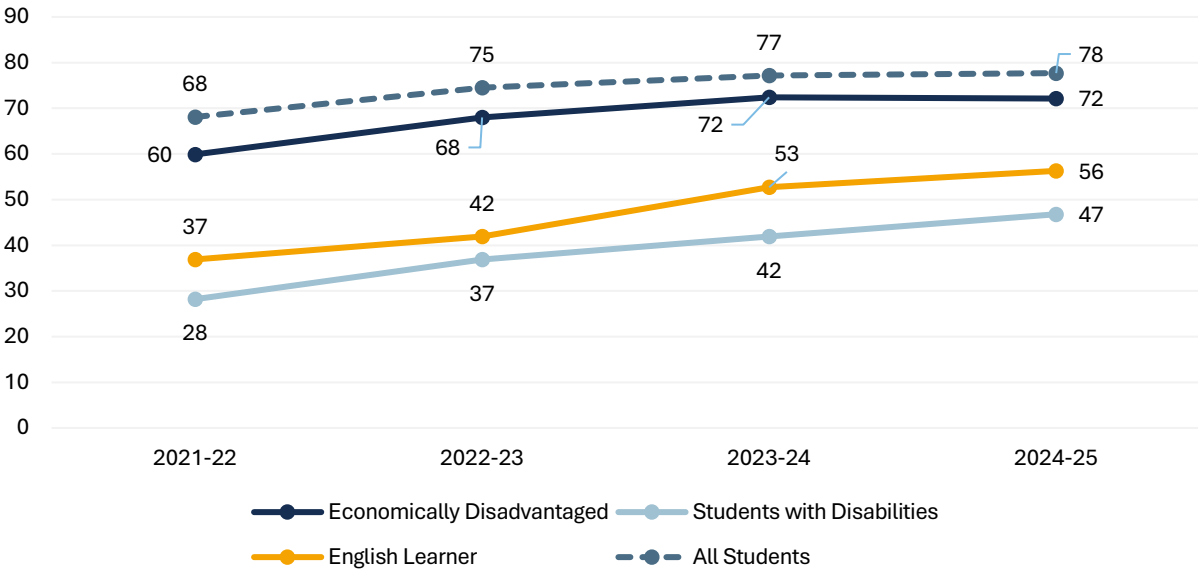
FIGURE 231: POSTSECONDARY READINESS INDICATOR SCORES BY STUDENT RACE/ETHNICITY, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.
Note: Scores are rounded to nearest whole number. Data for American Indian or Alaska Native and Native Hawaiian or Pacific Islander was not published due to limited sample size.

Similarly, postsecondary readiness scores for economically disadvantaged students, students with disabilities, and English learners have increased from 2021-22 to 2024-25. However, scores for each of these groups also remain below the districtwide postsecondary readiness score for all students (Figure 232).

FIGURE 232: POSTSECONDARY READINESS SCORES BY STUDENT GROUP, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.
Note: Scores are rounded to nearest whole number.

Recommendations	
14.3.a	JCPS should develop targeted postsecondary readiness resources and support to increase postsecondary readiness scores of African American and Hispanic/Latino students as well as English Learners, economically disadvantaged students, and students with disabilities.
14.3.b	JCPS should develop, track, and report on postsecondary readiness score targets for subgroups.

Graduation Rate

Finding	
14.4	Hispanic or Latino students and English Learners have lower graduation rates than their peers and are the only groups with declines from 2023-24 to 2024-25.

JCPS has established graduation requirements built around Kentucky's education goals set forth in the Kentucky Education Reform Act (KERA) and found in KRS 158.645 and KRS 158.6451.⁶⁷¹ JCPS adheres to Kentucky's 22-credit minimum and focuses heavily on career readiness and tailored learning pathways. The JCPS graduation requirements are shown in Figure 233.

⁶⁷¹ ["High School Student Progression, Promotion, and Graduation Handbook, 2025-26."](https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/4298/JCPS/4108721/High_School_Student_Progression_Promotion_and_Grading_Handbook_SPPG.pdf) Jefferson County Public Schools. Accessed April 21, 2026. https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/4298/JCPS/4108721/High_School_Student_Progression_Promotion_and_Grading_Handbook_SPPG.pdf

FIGURE 233: JEFFERSON COUNTY PUBLIC SCHOOLS GRADUATION REQUIREMENTS, 2025-26 SCHOOL YEAR

High School Graduation Requirements

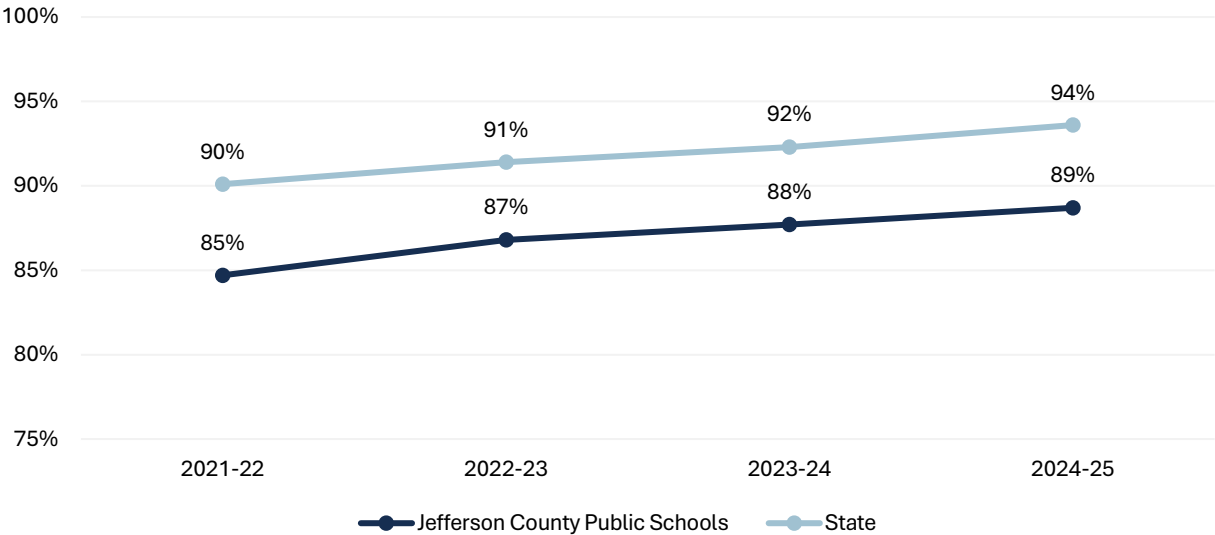
Graduation Requirements

Requirement	Credits	Description
English/Language Arts	4	English I, II, and two other personalized English/language arts credits aligned with the student's ILP
Mathematics	4	Algebra I, Geometry, Algebra II, or a career pathway course that incorporates the standards of Algebra II, and one other personalized math credit aligned with the student's Individual Learning Plan (ILP)
Science	3	Two foundational and one other personalized course to include content standards of Biology, Physics, Earth and Space Science, Chemistry, and unifying concepts
Social Studies	3	Two foundational courses (U.S. History and World History) plus a personalized course to include content standards of economics, government, and world geography (civics)
Health	1/2	
Physical Education	1/2	
Visual and Performing Arts	1	Students must earn one (1) credit in a visual and performing arts or a standards-based specialized arts course based on the student's ILP.
Electives	6	Additional credits aligned with the student's ILP
Total Credits	22	Minimum
Other Requirements		
Civics Exam	Pass with 60% or higher on a 100-question civics exam.	
	For students entering grade nine on or after July 1, 2025 , pass with 70% or higher on a 100-question civics exam.	
Workplace Skills	Receive instruction in essential workplace skills.	
Individual Learning Plan	Complete annual ILP (grades 6–12).	
Technology	Demonstrate performance-based competency in technology.	
Defense of Learning	Students are required to complete a presentation of learning and growth.	
Financial Literacy	Complete a Financial Literacy standards program or course.	
	Students entering grade nine on or after July 1, 2025, are required to complete a one credit course in financial literacy. The course may be: • One of the six elective credits required for graduation; or • A mathematics or social studies course required for graduation if it meets state standards for the content area and the criteria established in KRS 158.1411 for the financial literacy course, as determined by the District and approved by the Kentucky Department of Education.	

Source: Jefferson County Public Schools website.

As shown in Figure 234, the four-year graduation rate in JCPS has increased by four percentage points from 85% in 2021-22 to 89% in 2024-25; however, it still remains below the statewide rate. The four-year graduation rate is defined as the percentage of students earning a high school diploma in four years compared to the group of students who began high school in ninth grade. Each year, JCPS's four-year graduation rate has consistently been 5 percentage points lower than the state average, despite gains overall.

FIGURE 234: JEFFERSON COUNTY PUBLIC SCHOOLS FOUR-YEAR HIGH SCHOOL GRADUATION RATE, 2021-22 TO 2024-25 SCHOOL YEARS

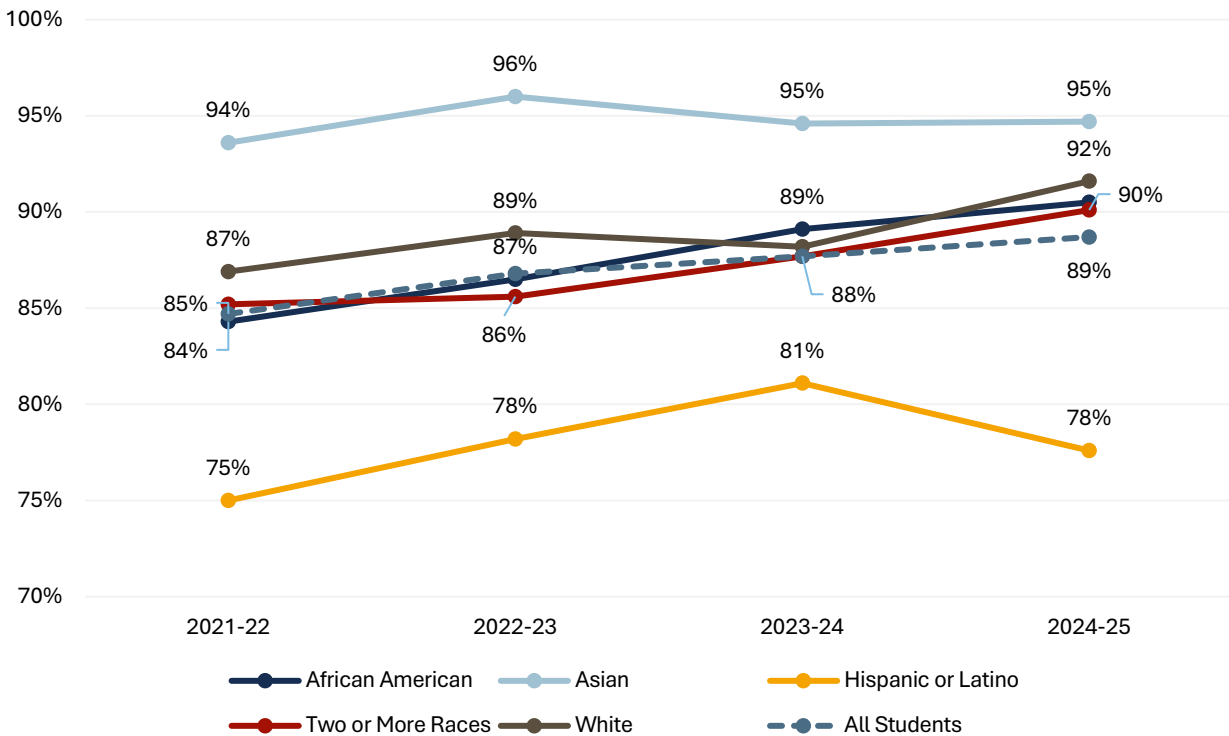


Source: Kentucky Department of Education Report Card Dashboard.

As shown in Figure 235, the four-year graduation rate varied across racial and ethnic groups with Asian students demonstrating the highest rates and Hispanic or Latino students demonstrating the lowest. Across all four years, Asian students graduated at higher rates than both the statewide rate and other student groups. Graduation rates for students identifying as white, two or more races, or African American closely tracked the districtwide rate for all students — remaining within three percentage points over the past four years.

Hispanic or Latino students have consistently graduated at lower rates than their peers, with an average gap of 9 percentage points compared to all students over the past four years. In 2024-25, the graduation rate for Hispanic or Latino students was 78% — 11 percentage points below the districtwide rate. Hispanic or Latino students were also the only student group to demonstrate a diminishing graduation rate from 81% in 2023-24 to 78% in 2024-25.

FIGURE 235: JEFFERSON COUNTY PUBLIC SCHOOLS FOUR-YEAR GRADUATION RATE BY RACE/ETHNICITY, 2021-22 TO 2024-25 SCHOOL YEARS

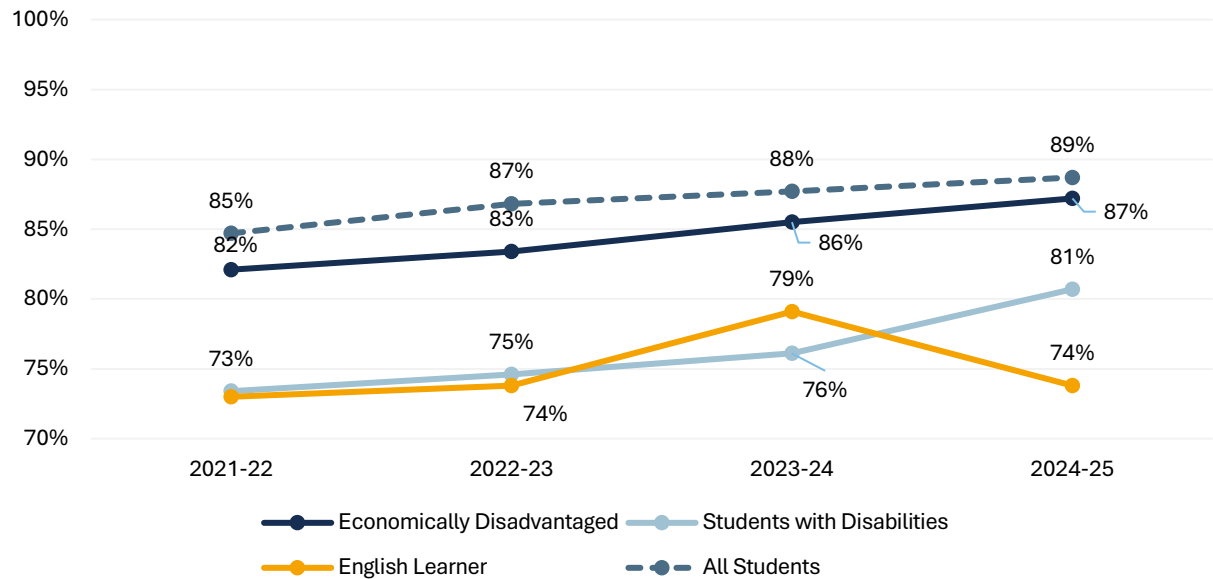


Source: Kentucky Department of Education Report Card Dashboard.

Note: Data for American Indian or Alaska Native and Native Hawaiian or Pacific Islander was not published due to limited sample size.

Economically disadvantaged students, students with disabilities, and English Learners consistently graduated at lower rates than all students in the District since 2021-22 (Figure 235). In 2024-25, 74% of English Learners graduated within 4 years compared to 89% of all students in the District — representing a 15-percentage point gap, the largest of any other student group that year. Students with disabilities demonstrated the highest growth in graduation rates with an eight-percentage point increase in the graduation rate from 73% in 2021-22 to 81% in 2024-25.

FIGURE 236: JEFFERSON COUNTY PUBLIC SCHOOLS FOUR-YEAR GRADUATION RATE BY STUDENT GROUP, 2021-22 TO 2024-25 SCHOOL YEARS



Source: Kentucky Department of Education Report Card Dashboard.

Recommendations	
14.4.a	JCPS should develop targeted graduation readiness supports and interventions to increase graduation rates among English Learners and Hispanic/Latino students.
14.4.b	JCPS should develop, track, and report on graduation rate targets for subgroups.

Graduate Outcomes

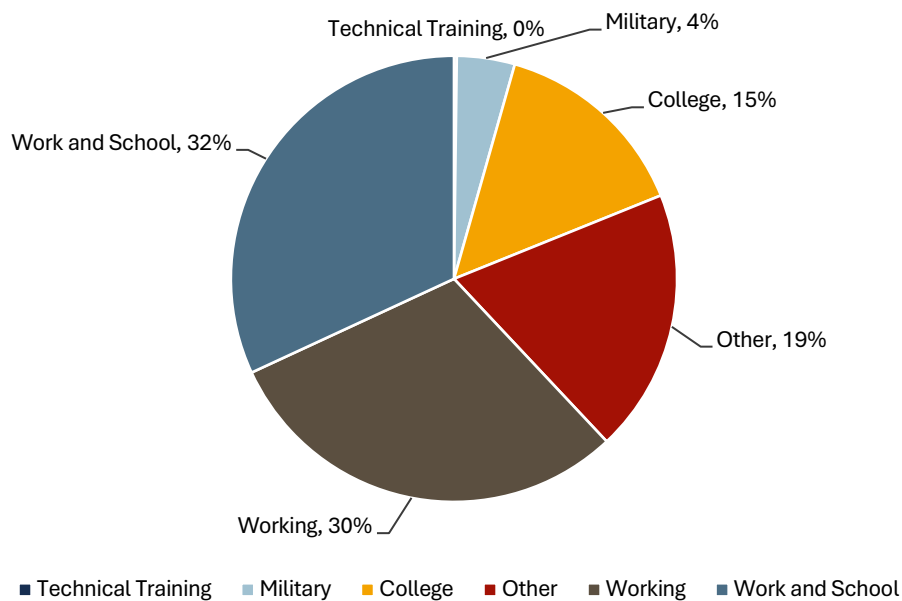
Observation	
14.5	KDE data on graduate outcomes at the district level is limited.

According to KDE data on 2024-25 JCPS graduates, fifteen percent of high school graduates enrolled in college, while most students (32%) pursued work and school after graduating high school (Figure 237). Thirty percent of students worked, 19% pursued another post-secondary path, four percent went on to join the military, and less than one percent pursued technical training. However, the KDE graduate outcome data is limited and cannot be disaggregated by student demographics. The graduate outcomes data does not provide detail on colleges attended, college courses of study, industries and wages for working graduates, or information on graduates not working or attending school. Kentucky Center for Statistics (KYSTATS) provides the “High School Feedback Report,” a public dashboard with information on high school graduate outcomes, including college-going and success metrics, college enrollment and outcomes, and loans and wages, available disaggregated by student demographics.⁶⁷² Certain metrics, such as in-state college-going rate, can be shown at the school district-level. JCPS may benefit from collaborating with

⁶⁷² “[High School Feedback Report](https://kystats.ky.gov/Latest/HSFR),” Kentucky Center for Statistics (KYSTATS). Retrieved April 22, 2026. <https://kystats.ky.gov/Latest/HSFR>

KYSTATS and utilizing their data and reporting to better understand outcomes for JCPS graduates and how it can inform JCPS strategies and goals around preparing students for college and career.

FIGURE 237: GRADUATE OUTCOMES FOR JCPS HIGH SCHOOL GRADUATES, 2024-25 SCHOOL YEAR



Source: Kentucky Department of Education Report Card Dashboard.

Recommendation	
14.5.a	JCPS should collaborate with KYSTATS and utilize their data and reporting to better understand outcomes for JCPS graduates and how it can inform JCPS strategies and goals around college and career readiness preparation.

APPENDICES

APPENDIX A: TERMINOLOGY LIST

- **AAC:** Augmentative and Alternative Communication
- **AASA:** The School Superintendents Association
- **ACCESS:** Assessing Comprehension and Communication in English State-to-State
- **ACFR/AFR:** Annual Comprehensive Financial Report
- **ACRE:** Advisory Council for Racial Equity
- **ACCESS:** Assessing Comprehension and Communication in English State-to-State
- **ADA:** Average Daily Attendance
- **ADHD:** Attention Deficit Hyperactivity Disorder
- **AI:** Artificial Intelligence
- **AIC:** Academic Instructional Coaches
- **AIS:** Accelerated Improvement Schools
- **AIM:** Aviation, Interactive Media Arts, and Manufacturing
- **AKSA:** Alternate Kentucky Summative Assessment
- **ALAS:** Association of Latino Administrators and Superintendents
- **AP:** Advanced Placement
- **APA:** Kentucky Auditor of Public Accounts
- **APR:** Annual Performance Report
- **ARC:** Admissions and Release Committee
- **ARE:** Affirming Racial Equity
- **ARMAC:** Audit and Risk Management Advisory Committee
- **ARSI:** Accountability, Research, & Systems Improvement
- **ASL:** American Sign Language
- **ATS:** Applicant Tracking System
- **ATSI:** Additional Targeted Support and Improvement
- **BAC:** Building Assessment Coordinator
- **BAI:** Bilingual Associate Instructor
- **BCBA:** Board-Certified Behavior Analyst
- **BIP:** Behavior Intervention Plan
- **CAO:** Chief Academic Officer
- **CAP:** Corrective Action Plans
- **CBE:** Content-Based English Language Development
- **CCEIS:** Comprehensive Coordinated Early Intervening Services
- **CDIP:** Comprehensive District Improvement Plan
- **CEP:** Community Eligibility Program
- **CERT:** College Equipped Readiness Tool
- **CFO:** Chief Financial Officer
- **CGCS:** Council of Great City Schools
- **CIO:** Chief Information Officer
- **COLA:** Cost of Living Adjustment

- **COO:** Chief Operations Officer
- **CRDC:** Civil Rights Data Collection
- **CRM:** Customer Relationship Management
- **CRT:** Crisis Response Team
- **CSI:** Comprehensive Support and Improvement
- **CSIP:** Comprehensive School Improvement Plan
- **CSR:** Comprehensive System Review
- **CSS:** Comprehensive School Survey
- **CTE:** Career and Technical Education
- **C&I:** Compliance and Investigations
- **DAC:** District Assessment Coordinator
- **DACA:** Deferred Action for Childhood Arrivals
- **Data MOA:** Data Memorandums of Agreement
- **DEI:** Diversity, Equity, and Inclusion
- **DEP:** Diversity, Equity, & Poverty
- **DFP:** District Facility Plan
- **DMRT:** Data Management Research Technician
- **DOC:** District Operations Center
- **DPA:** Data Privacy Agreement
- **DFP:** District Facility Plan
- **DMRT:** Data Management Research Technician
- **DEP:** Diversity, Equity, & Poverty
- **EA:** Executive Administrator
- **EBD:** Emotional/Behavioral Disabilities
- **ECE:** Exceptional Children Education
- **ECE:** Exceptional Children Education
- **ED:** United States Department of Education
- **EDEPRC:** Economic Diversity/Equity Program Review Committee
- **EL:** English Learner
- **ELD:** English Language Development
- **ELL:** English Language Learner
- **EMPT:** Equity Monitoring Progress Tool
- **EOP:** End-Of-Program Assessment
- **EPSB:** Kentucky Education Professional Standards Board
- **ESL:** English as a Second Language
- **ESSA:** Every Student Succeeds Act
- **ESSER:** Elementary and Secondary School Emergency Relief
- **ESZ:** Enhanced Support Zone
- **ESSA:** Every Student Succeeds Act
- **ESSER:** Elementary and Secondary School Emergency Relief
- **FBA:** Functional Behavioral Assessments
- **FCC:** Federal Communications Commission
- **FMD:** Functional Mental Disability

- **FPI:** Facility Profile Index Report
- **FRC:** Family Resource Center
- **FRL:** Free and Reduced Lunch
- **FRYSC:** Family Resource & Youth Services Centers
- **FSR:** Formative Systems Reviews
- **FY:** Fiscal Year
- **GAAP:** Generally Accepted Accounting Principles
- **GenAI:** Generative Artificial Intelligence
- **GIS:** Geographic Information Systems
- **GLI:** Greater Louisville Inc.
- **GRC:** Governance, Risk, and Compliance
- **GSSP:** Gifted Student Service Plan
- **HB:** House Bill
- **HQIR:** High-Quality Instructional Resources
- **HR:** Human Resources
- **HYA:** Hazard, Young, Attea, and Associates
- **IDEA:** Individuals with Disabilities Education Act
- **IEP:** Individualized Education Program
- **ILP:** Individualized Learning Plan
- **IS:** Instructional Support
- **ISMT:** Instructional Systems Monitoring Tool
- **ITS:** Investment Tracking System
- **JCBE:** Jefferson County Board of Education
- **JCPD:** JCPS Police Department
- **JCPEF:** Jefferson County Public Education Foundation
- **JCPS:** Jefferson County Public Schools
- **JCTA:** Jefferson County Teachers Association
- **JROTC:** Junior Reserves Officers Training
- **JTS:** Journey to Success
- **KAR:** Kentucky Administrative Regulation
- **KAS:** Kentucky Academic Standards
- **KAR:** Kentucky Administrative Regulation
- **KDA:** Kentucky Department of Agriculture Farm to School program
- **KDE:** Kentucky Department of Education
- **KEEP:** Kentucky Education Equality Protection
- **KEMP:** Kentucky Educator Mentorship Program
- **KEPS:** Kentucky Educator Placement Service
- **KERA:** Kentucky Education Reform Act
- **KETS:** Kentucky Education Technology System
- **KFICS:** Kentucky Facilities Inventory and Classification
- **KETS:** Kentucky Education Technology System
- **KPI:** Key Performance Indicator
- **KRS:** Kentucky Revised Statute

- **KSA:** Kentucky Summative Assessment
- **KSBA:** Kentucky School Boards Association
- **KSA:** Kentucky Summative Assessment
- **KTIP:** Kentucky Teacher Internship Program
- **KWIB:** Kentucky Workforce Innovation Board
- **KYSTATS:** Kentucky Center for Statistics
- **LEASE:** Leading for Equity, Accountability, Support, and Expectations
- **LEF:** Local Education Foundations
- **LFPC:** Local Facilities Planning Committee
- **LIEP:** Language Instruction Education Program
- **LMPD:** Louisville Metro Police Department
- **LRE:** Least Restrictive Environment
- **LTR:** Louisville Teacher Residency
- **LUL:** Louisville Urban League
- **MAP:** Measures of Academic Progress
- **MBE:** Minority Business Enterprises
- **METAL:** Manufacturing, Engineering, Technology, Allied Health, and Leadership
- **MHP:** Mental Health Practitioner
- **ML:** Multilingual Learners
- **MMD:** Mild Mental Disability
- **MOA:** Memorandums of Agreement
- **MOU:** Memorandums of Understanding
- **MRI:** More Rigorous Intervention
- **MSAP:** Magnet Schools Assistance Program
- **MOU:** Memorandums of Understanding
- **MTSS:** Multi-tiered systems of support
- **MUNIS:** Municipal Information System
- **NAEP:** National Assessment of Educational Progress
- **NASP:** National Association of School Psychologists
- **NCES:** National Center for Education Statistics
- **NGL:** Next Generation Learning
- **NSBA:** National School Board Association
- **NTIP:** New Teacher Induction Program
- **OCR:** United States Office of Civil Rights
- **OHI:** Other Health Impairment
- **OML:** Office of Multilingual Learners
- **OSE:** Office of Special Examinations
- **OSGAT:** Office of State Government Audits and Technology
- **OWES:** Occupational Employment and Wage Statistics
- **PAFR:** Popular Annual Financial Report
- **PBIS:** Positive Behavior Interventions and Supports
- **PCC:** Professional Customer Care
- **PCG:** Public Consulting Group

- **PDLT:** Professional Development and Learning Team
- **PEN:** Public Education Network
- **PLC:** Professional Learning Community
- **PO:** Purchase Order
- **POE:** English Language Development Pull-Out
- **PPLC:** Principal Professional Learning Community
- **PSC:** Professional Services Contract
- **PSP:** Private Schools Service Plan
- **REAP:** Racial Equity Analysis Protocol
- **REC:** Racial Equity Committee
- **REP:** Racial Equity Plan
- **RFP:** Request for Proposal
- **RO:** Routing Optimization
- **ROI:** Return on Investment
- **RP:** Restorative Practices
- **SBDM:** School-Based Decision Making
- **SC:** School Choice
- **SCC:** School Calendar Committee
- **SCNS:** School and Community Nutrition Services
- **SCS:** Substitute Center Specialist
- **SEEK:** Support Education Excellence in Kentucky
- **SEI:** Sheltered English Instruction
- **SEL:** Social-Emotional Learning
- **SEM:** Structured English Immersion
- **SFCC:** School Facilities Construction Commission
- **SLD:** Specific Learning Disability
- **SNTA:** Special Needs Transportation Assistant
- **SOFG:** Student Outcomes Focused Governance
- **SOP:** Standard Operating Procedures
- **SPP:** State Performance Plan
- **SRO:** School Resource Officer
- **SSBIH:** Student Support and Behavior Intervention Handbook
- **SST:** School Start Time Initiative
- **TEC:** Technology, Engineering, and Construction Academy
- **TOC:** Table of Contents
- **TRACK:** Tech Ready Apprenticeships for Careers in Kentucky
- **TSI:** Targeted Support and Improvement
- **TUDA:** Trial Urban District Assessment
- **TWI:** Two-Way Immersion
- **USDA:** United States Department of Agriculture
- **WBE:** Women Business Enterprises
- **YSC:** Youth Service Center

APPENDIX B: FY23-25 REVENUE AND EXPENDITURE OVERVIEW

JCPS receives audits each year, which include an Annual Comprehensive Financial Statement (ACFR) audit and Single Audit Report in accordance with Uniform Guidance. JCPS collected approximately \$1,866,223,182 in governmental fund revenues in FY 2025, compared with \$1,821,459,995 in FY 2024 and \$1,920,138,469 in FY 2023. JCPS collects revenues from local sources, state sources, federal grants, interest, and other sources, with the largest revenue source being local property taxes, as shown in the figure below.

FIGURE 238: ACFR REVENUES FY23-25

Revenues	FY 2023	FY 2024	FY 2025
Property taxes	\$ 627,463,151	\$ 660,469,578	\$ 706,178,642
State source: Other state revenues	462,942,061	388,193,354	430,085,604
Occupational taxes	206,342,623	212,522,322	222,962,802
State source: SEEK program	233,759,766	203,474,758	216,243,537
Grants from the U.S. Government	247,411,258	200,225,093	146,200,075
Other Taxes, Grants, & KSFCC allocation	97,651,899	57,814,245	52,681,116
Interest & Other Sources	44,567,711	58,116,512	49,124,657
Motor Vehicle taxes	-	40,644,133	42,746,749
Total	\$ 1,920,138,469	\$ 1,821,459,995	\$ 1,866,223,182

Source: JCPS Annual Comprehensive Financial Report for FYs 2023 - 2025.

JCPS expended approximately \$2,067,026,198 billion in governmental funds in FY 2025 compared with \$1,958,413,153 in FY 2024, and \$1,946,595,284 in FY 2023. Total Other is comprised of the following categories which account for less than two percent each of total expenditures: district administrative support services, food service operations, community services, other instructional support services, debt service principle and interest, and other. For FY 2025, the largest source of expenditures is Instruction, which accounts for \$1,007,635,211 or nearly 50% of total expenditures for the year. A comparison in expenditure levels for the other categories from FY 2023 to FY 2025 is shown in the figure below.

FIGURE 239: ACFR EXPENDITURES FY23-25

Expenditures	FY 2023	FY 2024	FY 2025
Instruction	\$ 966,975,857	\$ 964,029,961	\$ 1,007,635,211
Student support services	115,454,042	120,307,009	132,430,575
Instructional staff support services	183,309,965	163,385,894	170,672,077
School administrative support services	135,976,373	135,786,858	143,955,846
Business support services	80,709,961	101,159,176	84,246,277
Plant operations and maintenance	162,311,198	181,012,496	183,148,786
Transportation	89,611,027	111,367,669	120,852,696
Building renovations	103,907,406	89,332,290	133,432,899
Total Other	108,339,455	92,031,800	90,651,831

Total Expenditures	\$ 1,946,595,284	\$ 1,958,413,153	\$ 2,067,026,198

Source: JCPS Annual Comprehensive Financial Report for FYs 2023 - 2025.

APPENDIX C: FY25 PURCHASE ORDER EXPENDITURES

The table below represents all FY25 Purchase Order (PO) expenditures by Account Description found in Purchase Order (PO) data provided by JCPS. The “Sum of Account Amt” column represents the total sum of all PO expenditures by Account Description. For most Account Descriptions, multiple POs representing multiple expenditures at the school and/or Central Office division level are represented. For example, 248 expenses ranging in amounts from \$0.92 to \$976.50 are included in the \$14,749.81 worth of expenses included in the “Sum of Account Amt” column for the “ART” Account Description.

FIGURE 240: FY 2025 PURCHASE ORDER EXPENDITURES

Account Description	Sum of Account Amt
CONSTR SVC	\$ 72,346,381.03
OTH PF SVS	\$ 38,460,413.76
OTH REPAIR	\$ 22,114,734.33
SUPP BKS	\$ 20,298,262.04
ELECTRIC	\$ 19,842,653.53
TRANS INS	\$ 19,580,000.00
SUPP/TECH	\$ 19,120,799.11
INV FD SRV	\$ 17,963,522.56
FOOD	\$ 15,712,000.00
BUS CONTR	\$ 13,694,394.18
TECH SOFTW	\$ 12,216,049.44
OTHER CONS	\$ 12,164,869.11
SUPPLIES	\$ 11,854,792.69
TECH HARDW	\$ 10,835,898.21
MEDIC SVCS	\$ 10,465,938.68
FURN/FIXTR	\$ 8,356,462.61
OTR EQUIP	\$ 8,324,256.90
INV DIESEL	\$ 5,695,000.00
TECH R&M	\$ 5,386,989.57
NAT GAS	\$ 4,600,000.00
SEWAGE	\$ 4,429,000.00
VEHICLES	\$ 4,095,018.88

BLDG R&M	\$	4,088,078.83
GEN LIAB	\$	3,309,315.42
OTHER	\$	3,132,964.04
GRP LIAB I	\$	3,025,000.00
TECH	\$	3,000,000.00
PHONE	\$	2,665,511.75
PROP INS	\$	2,603,772.00
INV MAINT	\$	2,469,545.95
OTHR INSUR	\$	2,410,000.00
WATER	\$	2,151,000.00
FLEET INS	\$	2,020,000.00
REG FEES	\$	1,757,558.32
OTH SUP MT	\$	1,598,964.28
REP PARTS	\$	1,531,668.16
INV NICHOL	\$	1,419,503.59
LTD PAYABL	\$	1,334,000.00
UNEMP PBL	\$	1,320,000.00
WELFARE	\$	1,311,196.17
BLDG RENT	\$	1,247,287.32
OTR PR TRN	\$	1,242,233.30
LAND&IMP	\$	1,148,256.60
TRAVEL	\$	1,133,077.06
GARBAGE	\$	1,079,445.15
OTHER RENT	\$	1,016,102.17
INV INSTR	\$	1,007,597.88
TESTS	\$	840,304.55
EQ/MA/FU R	\$	792,135.86
ST LIA INS	\$	787,556.00
LEGAL SVCS	\$	786,000.00
LIFE INS P	\$	770,000.00

TUIT REIMB	\$	742,198.00
LIB BOOKS	\$	712,550.30
CHOICE	\$	671,884.27
INV BLNKBK	\$	659,641.39
CONTR GRND	\$	601,902.14
POSTAGE	\$	526,245.45
WORK COMP	\$	518,038.00
EQP SUPP	\$	515,413.86
FIELD TRIP	\$	478,079.04
UNIFORMS	\$	470,882.92
TEXTBK/MAT	\$	446,374.78
AUDIT SVCS	\$	426,740.38
HEALTH SUP	\$	396,772.62
MUS INSTR	\$	373,925.54
SECUR SVCS	\$	369,565.75
GASOLINE	\$	362,500.00
TRAV OTDST	\$	358,476.79
TIRES&TUBE	\$	346,348.00
OTHER STTR	\$	345,860.00
FD NI NFS	\$	314,689.89
OTH PRINTN	\$	304,617.54
COPIER RNT	\$	280,820.96
DUES & FEE	\$	264,849.16
PERMITS	\$	263,400.00
LAUNDRY SE	\$	246,300.00
ADM EQ	\$	231,178.55
MAG & NEWS	\$	224,619.90
MACHINERY	\$	196,124.87
JR ACH	\$	182,000.00
INV CUSTOD	\$	166,244.97

OTHER S/M	\$	156,821.30
LUBRICANTS	\$	144,359.29
CONT BUS M	\$	128,670.49
AUDVIS MAT	\$	108,662.99
INV TRACTR	\$	96,643.71
MI REPAIR	\$	91,250.00
CELL PHONE	\$	76,543.52
JR ACHIEVE	\$	75,000.00
GATE	\$	69,293.24
FD I NFS	\$	68,268.93
STD FEE/RE	\$	65,709.00
HUDSON	\$	60,120.23
E3 ADULT	\$	57,008.87
GRAD EXP	\$	57,000.00
ATHLETICS	\$	54,910.32
DRUG TESTS	\$	54,032.00
STD AWARDS	\$	52,655.45
VEHCL RENT	\$	50,000.00
TUITION-OT	\$	48,972.00
BUS TOKEN	\$	47,731.00
FIDEL BOND	\$	44,090.00
SHP DEL FR	\$	39,872.20
OTHR ADVRT	\$	37,637.14
OTHER TRAN	\$	30,353.02
LAWN SUPP	\$	25,995.45
STUDENTS	\$	25,001.65
ID'S	\$	21,258.94
SCHSHIP	\$	21,009.56
ENGLISH	\$	19,524.62
SCIENCE	\$	16,109.27

BOTTLD GAS	\$	16,000.00
OTHR EXP	\$	15,890.13
ORCHESTRA	\$	15,256.40
TUITION	\$	15,021.00
ART	\$	14,749.81
YEARBOOK	\$	13,658.85
OTH UTIL	\$	13,500.00
R&T ADVER	\$	13,145.00
REF MAT	\$	12,775.63
LIBRARY	\$	11,680.81
PARKING	\$	9,360.40
WRESTLING	\$	9,254.20
BAND	\$	8,398.16
PROF CONS	\$	8,340.00
STD GEN	\$	7,608.00
PSAT	\$	7,102.80
STUDENT	\$	6,496.02
STUD GEN	\$	6,404.57
HEALTH/PE	\$	6,318.82
ST GENERAL	\$	6,000.00
Vehic R&M	\$	6,000.00
RECRUITMNT	\$	5,568.52
DRAG PRIDE	\$	5,514.45
CABLE TV	\$	4,580.24
AGENDA	\$	4,430.19
AUDIT SVC	\$	4,300.12
SCHOLARSHI	\$	4,300.00
AT RISK	\$	3,878.27
BOOK FAIR	\$	3,720.32
PERS SVC	\$	3,712.50

WL FEES	\$	3,221.77
TRAV MILE	\$	3,197.29
NEWSPAP/AD	\$	3,012.51
OTH COMM	\$	3,000.00
SPIRITWEAR	\$	2,974.78
PUBLICATNS	\$	2,970.00
INSTR EQ	\$	2,918.32
CAMP	\$	2,500.00
BAIRD	\$	2,410.07
SS FEES	\$	2,394.04
STEM	\$	2,175.00
INST EQUIP	\$	2,111.61
BINDNG/REP	\$	2,020.28
INST FEES	\$	1,516.11
FEES	\$	1,325.00
ADULT FUND	\$	1,263.61
C VAUGHT	\$	1,250.00
GEN DON	\$	1,200.00
PBIS	\$	1,173.54
ADULT	\$	1,107.13
SCHOLARSHP	\$	1,000.00
POOH	\$	948.24
LST BKS	\$	862.24
REPAIRS	\$	675.00
HUMANITITE	\$	528.86
ECE	\$	514.74
TENNIS DON	\$	500.00
CHOIR	\$	456.39
PICTURES	\$	440.78
REGISTRATI	\$	413.78

PROM	\$	200.00
TRAV IN DT	\$	55.00
STEP TEAM	\$	50.00
SSI	\$	40.00
INST I-ECE	\$	26.30
POSTERS	\$	20.22
Grand Total	\$	424,711,698.11

Source: FY25 Purchase Order Expenditures provided by Jefferson County Public Schools.

APPENDIX D: JCPS RESPONSE TO BUSING AUDIT

STAGE 1			
#	Recommendation	Suggested Action	JCPS Progress/Response
2-2	Develop systematic procedures for communication and collaboration between departments related to school choice and schedule ongoing reviews of school choice zones and boundaries with the district transportation department to ensure students receive transportation services to their choice schools as appropriate.	1. Proactive approach 2. Improved communication 3. Joint collaboration, problem-solving, and planning w/ departments impacted by school choice decisions. 4. Leaders of the transportation, school choice, operations, and communications department should meet on a regular basis to discuss transportation and facility capacity, trends in student applications, messaging to parents and the community, and related concerns as they arise à URGENT first topic: Assessing the potential impact of grandfathering on transportation needs in upcoming school years.	There is currently an ongoing meeting joining School Choice, Facilities, GIS, and Operations Leadership to cross-departmentally collaborate on these efforts. Examples of this collaboration include: 1) During the 2024-2025 school year, we created a timeline calendar on when key decisions need to be made by all stakeholders, including the board, in order to inform families of any changes in transportation, boundary changes, etc. at the JCPS Showcase of Schools, prior to the enrollment application window. This timeline was shared with key leadership stakeholders including the JCPS BOE. 2) A middle school boundary adjustment, implemented for 2025-26, since middle grandfathering was already over. This collaborative group understands the system constraints and recognizes that with the elementary zones and high resides boundaries being the same, ideally we do not want to change high or elementary boundaries again until 2028-29, when all phases of grandfathering are complete from the current implementation.
2-3	Assign default schools to students who do not complete a school choice application by the established deadline.	1. The district should adopt a default school assignment process for students who do not complete an application. 2. The district should also adopt an appeals process that would allow a student to request a change. · This process should have a deadline in June of the preceding year for the school year.	After consideration, the department decided not to proceed with implementation due to several factors. The School Choice Plan is designed to ensure families actively engage in the application process, with the Dual Resides plan providing options for Choice Zone students. Creating a default assignment would conflict with this design and purpose of the School Choice plan. In 2024-25, the district did have to deviate from this plan due to facility and capacity issues at the middle/high Choice Zone close-to-home options and default students to their far-away option after the start of the school year. The district also had to default Choice Zone high school students for the 25-26 school year to their far-away option due to facility and capacity issues. The middle school close to home option is still currently available and we are closely monitoring capacity. In addition, our highly mobile community makes summer moves unpredictable, limiting the effectiveness of a default assignment system. Instead, the School Choice Office, school staff, and Outreach Coordinators will continue to support families in completing applications. The district is also exploring elementary priority zones to provide more predictability for families and improve efficiency in school assignments and transportation.

3-1	Review options for adjusting SSTs for 2024-25.	1. Adopt a 3rd party routing software and prepare to use it for 2025-2026 academic year. 2. JCPS transportation director should convene weekly meetings w/ subordinate staff to explore options for adjusting selected school start times using these questions: *Are there pairs of schools where adjusting the SST of 1 or both would likely lead to better operational performance? Are there schools where, given current operational capacity, it is likely the school could be better served at either the adjacent earlier SST or the adjacent later SST?	School start times were reviewed with the Board of Education during the 2024–2025 school year, resulting in the approval of a three-tier start time model for implementation in the 2025–2026 school year. In response to the Board's request to evaluate start times within existing system constraints, several options were presented to principals for consideration in a future school year. At the time, routing for 2025–2026 had already been completed and was entering the implementation phase. A third-party routing software solution has been selected and is currently being implemented across a multi-year rollout, with full implementation scheduled for the 2026–2027 school year. Data confirms that the decisions regarding pairing and tiering have been effective in creating a more efficient and reliable transportation service. The model was slightly adjusted in 2024–2025 to incorporate additional Magnet service and has been fully replicated for the 2025–2026 school year. Due to multiple operational considerations, changes to secondary school start times between tiers are not feasible at this time. District leadership remains in ongoing communication with the Board of Education, academic leadership, and the communications team regarding any potential adjustments related to this topic.

STAGE 1			
#	Recommendation	Suggested Action	JCPS Progress/Response
3-2	Review options for moving schools on mini-tier start times to a major tier start time.	1. Adopt a 3rd party routing software and prepare to use it for 2025-2026 academic year. 2. JCPS transportation director should convene weekly meetings w/ subordinate staff to explore options for adjusting the SSTs of schools currently on mini-tiers using these questions: *Can consolidation of existing mini-tier bus runs make it possible to fit a school into the earlier or major tier time? *What was gained operationally by placing each school on a mini-tier start time? If nothing was gained, then it should be moved to an adjacent major tier time. If there was an operational gain, can the same gain be accomplished elsewhere and the school moved to a major tier start time?	School start times were reviewed with the Board of Education during the 2024–2025 school year, resulting in the approval of a three-tier start time model for implementation in the 2025–2026 school year. In response to the Board’s request to evaluate start times within existing system constraints, several options were presented to principals for consideration in a future school year. At the time, routing for 2025–2026 had already been completed and was entering the implementation phase. A third-party routing software solution has been selected and is currently being implemented across a multi-year rollout, with full implementation scheduled for the 2026–2027 school year. Data confirms that the decisions regarding pairing and tiering have been effective in creating a more efficient and reliable transportation service. The model was slightly adjusted in 2024-2025 to incorporate additional Magnet service and has been fully replicated for the 2025–2026 school year. Due to multiple operational considerations, changes to secondary school start times between tiers are not feasible at this time. District leadership remains in ongoing communication with the Board of Education, academic leadership, and the communications team regarding any potential adjustments related to this topic.
3-3	Review options for adjusting all secondary schools to the 8:40 am or later SST for 2024-25.	1. Adopt a 3rd party routing software and prepare to use it for 2025-2026 academic year. 2. JCPS transportation director should convene weekly meetings with subordinate staff to explore options for adjusting selected school start times using this question: *Within the existing SST table, where can a secondary school on the 7:40-8:10 a.m. starts be swapped for 1+ elementary schools on the 9:40 start?	School start times were reviewed with the Board of Education during the 2024–2025 school year, resulting in the approval of a three-tier start time model for implementation in the 2025–2026 school year. In response to the Board’s request to evaluate start times within existing system constraints, several options were presented to principals for consideration in a future school year. At the time, routing for 2025–2026 had already been completed and was entering the implementation phase. A third-party routing software solution has been selected and is currently being implemented across a multi-year rollout, with full implementation scheduled for the 2026–2027 school year. Data confirms that the decisions regarding pairing and tiering have been effective in creating a more efficient and reliable transportation service. The model was slightly adjusted in 2024-2025 to incorporate additional Magnet service and has been fully replicated for the 2025–2026 school year. Due to multiple operational considerations, changes to secondary school start times between tiers are not feasible at this time. District leadership remains in ongoing communication with the Board of Education, academic leadership, and the communications team regarding any potential adjustments related to this topic.
4-1	Re-establish and adhere to an annual routing timeline.	1. The district should implement a clear drop-dead enrollment date and routing deadlines to ensure that transportation planning aligns with finalized student enrollments. 2. The district should reintroduce the original JCPS routing timeline, coupled with the utilization of advanced computerized routing systems.	The transportation/operations annual calendar has been approved by the BOE, implemented, and communicated to operations, academic stakeholders, and Communications. It contains change variables such as student assignment decisions, school start times and new programming. The routing season schedule is outlined with open entry windows, deadlines, a pause period, driver simulations and public opening of bus route information. Compounds and drivers are notified electronically regarding new bus stops. Compounds and drivers work to provide their own direction sheets as they have up to 48 hours to review changes and practice them. A visually improved calendar is being created this year to increase clarity of these deadlines for departments and parents/guardians. The improved calendar will again be shared with Communications.

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#	Recommendation	Suggested Action	JCPS Progress/Response
4-2	Rework AR routes.	Conduct a comprehensive review and realignment of routes and schedules to ensure a more efficient, reliable, and student-centric transportation framework. Key tasks: 1. Allocate runs more logically to avoid excessive overlapping of school pickups/drop-offs within the same tier and adjust bell times accordingly. 2. Review and adjust driver schedules to ensure they have manageable workloads, reducing the number of runs per day and keeping working hours within reasonable limits. 3. Rework route designs to minimize travel distances and streamline bus routes, taking into account geographical areas, school locations, and traffic conditions. 4. Re-evaluate the decision to un-mirror routes and consider reinstating mirrored routes if it leads to more efficient and timely service. 5. Ensure consistency in bus stop locations between morning and afternoon runs to provide familiarity for students and school staff and added security for parents in knowing where their students will be. 6. Review IEPs and accommodate the specific equipment needs of special education students when planning and assigning bus routes. Ensure buses serving these students are equipped accordingly. 7. Adjust bus schedules to align with school bell times more accurately, ensuring buses arrive neither too early nor too late to minimize disruption for students, parents, and school staff. Pair schools together that the compound coordinators already know will work and not cause overly difficult traffic delays. 8. Involve stakeholders (transportation managers, coordinators, and drivers) in the route review process to gather feedback on the effectiveness of the revised routes and to identify any ongoing issues that need addressing. 9. Implement a system for ongoing monitoring and evaluation of bus routes' effectiveness, taking feedback from drivers, schools, and families into consideration. Adjust routes as needed based on real-time data and feedback. A student count should be maintained daily by drivers and handed in monthly for better informed decisions on bus loads when routes are being created yearly.	All transportation routes were revisited and realigned in accordance with the current tier system. Progress continues toward the goal of achieving 100% route mirroring. Based on available resources and established school schedules, we have been able to restore approximately 75% mirroring for the current school year. Individualized Education Programs (IEPs) are carefully reviewed to ensure that the specific transportation needs of each student with disabilities are appropriately addressed. Additionally, systems are already in place to collect and incorporate stakeholder feedback on routes, supporting continuous improvement and responsiveness to community needs.
4-3	Create more effective communications processes around routing.	Key guidelines for routing should be documented and understood by transportation staff. *The department should maintain thorough documentation of the revised routes, schedules, and any changes made throughout the implementation process. *When major routing changes occur, they should be clearly communicated to drivers and time set aside for drivers to review those changes and, if needed, practice them.	Key guidelines are continuously reviewed and discussed throughout the routing process. The centralized routing team works diligently to ensure consistent handling of all requests. Compounds and drivers are notified electronically of any new bus stops. They are responsible for preparing their own direction sheets and are given up to 48 hours to review and practice the changes.

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#	Recommendation	Suggested Action	JCPS Progress/Response
4-4	Adopt an integrated routing, GPS, and camera system.	Adopt an all-inclusive routing, GPS, and camera system that establishes seamless communication with Infinite Campus, the district's student information system, facilitating the automation of daily reports. JCPS will need to: 1. Conduct a thorough needs assessment to identify the specific features required in an all-inclusive routing, GPS, and camera system. Consider input from transportation staff, administrators, and other stakeholders. 2. Research and select, via an RFP process, suitable all-inclusive routing software that meets identified needs. The selected software should allow for seamless integration of various features in 1 platform. 3. Develop a training program for transportation staff to familiarize them with the new routing software. Training should cover all aspects, including students, creating bus stops, updating routes, and using integrated features. 4. Implement the selected routing software across the district. Transportation department staff will need to work closely with the software provider to ensure a smooth integration process and resolve any issues that may arise during implementation. 5. Collaborate with the Infinite Campus team to establish bidirectional communication between the routing software and Infinite Campus. District IT staff should ensure that daily reports are automated and seamlessly transferred between the systems. 6. Work with special education department to integrate IEP information into the routing software. This should include ensuring that the software can directly read and implement the specifications outlined in a student's IEP for equipment compliance. 7. Implement a system for ongoing monitoring and evaluation of the new routing system. JCPS should gather feedback from transportation staff, drivers, and other stakeholders to identify areas for improvement and make necessary adjustments.	Progress is being made towards this goal. After an extensive search and vetting process, a 3rd party routing software has been selected and purchased. Implementation is being phased in over a multi-year approach. This school year, only the special needs routes are in the new routing system so that the system components can be tested to flush out and resolve any issues. Full implementation is planned for the start of the 2026-2027 school year, which will include tablet integration to improve GPS data flow. A camera system is already in place on each bus.
5-1	Improve the district's Professional Services Contract administration by formally designating a contract administrator or contract manager for each contract and develop specific responsibilities for the position.	1. The purchasing director should develop a procedure that requires each professional services contract to designate a contract administrator or contract manager. 2. The procedure should include the responsibilities of the contract administrator/manager and require the administrator/manager to be appointed prior to and involved in the selection of the vendor. 3. The procedure should be distributed to all departments. 4. The contract administrator/manager should be available to communicate the status of the contract to management and the board.	1. We disagreed with this recommendation because it is already being done consistently at JCPS. 2, 3, and 4. We have identified challenges in our contract management process and are currently working on a new administrative procedure which will outline the process and responsibilities of contract administrators, and will train all JCPS contract administrators on this new administrative procedure.
5-2	Improve the timing of payments in Professional Services Contracts and Data Privacy Agreements to help ensure the district receives satisfactory services before making payments to vendors.	The purchasing director should develop guidelines and instructions to follow when developing professional services contracts or data privacy agreements pertaining to specifying when payments to the vendor can be made. · The guidelines should either be incorporated into the district's Instructions for Completing the Contract for Procurement of Professional Services or attached as an addendum. Prior to approving a professional services contract or data privacy agreement, the purchasing director should ensure that the agreement specifically identifies the steps or deliverables that must be completed before payments can be processed.	Although we disagree that this is the responsibility of the Purchasing Director, we agree that each contract should clearly specify the deliverables required for the contractor to receive payment, as will be outlined in the new administrative procedure. We will specify this requirement, and the contract administrator's ethical responsibility for verifying that these deliverables have been achieved, in our administrative procedure and the associated training on this procedure for contract administrators.

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#	Recommendation	Suggested Action	JCPS Progress/Response
5-3	Improve Professional Services Contract documents' scope of services to help ensure the district receives the services that it needs and is paying for.	1. A process should be implemented to review the scope of services section of each professional services contract or other financial document for the specific services to be provided, a timeline for completing milestones during the term of the contract, and the final deliverables before contracts are signed. 2. The purchasing director should develop detailed guidelines for developing the scope of services section of professional services contracts. *The guidelines should provide guidance for the development of the scope of services that sufficiently describes the services that the district will require the vendor to provide. *The guidelines should either be incorporated into the district's Instructions for Completing the Contract for Procurement of Professional Services or attached as an addendum. *The updated instructions should be distributed to all departments. Prior to approving a contract for procurement of professional services the purchasing director should ensure that the scope of services is sufficient to enable the district to properly manage the services to be provided.	The Professional Services Contract, and the instructions that accompany the document, are under the purview of the General Counsel's office, not Purchasing. We agree that the description of services to be performed is less clear than it should be in some contracts. We will incorporate this into our administrative procedure and the associated training to ensure that contracts specify the level of services required to achieve payment and that contract administrators understand their responsibilities to verify service delivery prior to payment.
5-4	Improve the district process for using Sole Source contracting.	1. Require the district staff member who is to serve as the contract administrator or manager to thoroughly research the availability of vendors who could possibly provide the needed services. · Full document the process. · References should be checked and documented. 2. When it is determined that there is only one vendor available, the process used to make this determination should be fully documented, including why the chosen vendor was selected and what special skills or qualifications the recommended vendor has that will enable them to successfully complete the requirements of the project. 3. The purchasing director should develop guidelines to provide guidance and requirements that must be followed before a Sole Source contract can be issued. · The guidelines should specify what must be performed when determining that there is only a single vendor capable of providing a service, providing guidance on verifying references, and documenting all processes performed. · Should be attached as an addendum to the district's form for noncompetitive negotiation determination. · Should be distributed to all departments. 4. Prior to approving a contract for procurement of professional services the purchasing director should ensure that the process for determining that only a single source is available for performing the needed service has been properly performed.	JCPS mandated that requisitioners document the process for determining that a vendor qualifies as the sole source for the contracted services or products. This documentation is attached to the requisition for inspection before the purchase order is issued to the vendor. We have had a request that this documentation be made available during Board review of contracts as well. We are currently writing an administrative procedure to accomplish this and formalize what should be included in this documentation. This should be completed in the next month and rolled out to all JCPS.
6-1	Include representatives of all departments in major initiative planning.	1. Require representatives of all JCPS departments, as well as those who will carry out the plans, to participate meaningfully in the planning process. · Minutes from groups meetings should be kept and posted to a common folder. · Diversity in planning group 2. District staff should have an internal process that occurs prior to community forums to address their concerns and help ensure success of the initiative before the plan is presented to the community. 3. Provide training and capacity building opportunities for departmental staff and school leaders to enhance their understanding of complex initiatives and their roles in successful implementation.	As recommended, we hired a project manager who is now leading large-scale, cross-division projects that require coordination and oversight. She manages the scheduling of all meetings, records notes, and ensures follow-up. Current projects include the evaluation and selection of a new district tip line, planning for the new district operations center, collaborating on first day of school logistics, and coordinating the transition of central office to a new building. This fall, we held seven community forums - one in each board member district - with cabinet-level representation at each session. Forums were scheduled at varied times of the week to encourage broader participation and supported by a comprehensive communication plan. Community concerns raised during these sessions were documented, vetted, and followed up on. Dr. Yearwood plans to hold another round of forums in the spring to continue the dialogue. We are still determining the most effective approach to capacity building. With a new Superintendent and a permanent Chief of HR in place, we anticipate their leadership will help shape and guide how we provide training and support for staff to strengthen implementation of complex initiatives.

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#	Recommendation	Suggested Action	JCPS Progress/Response
6-2	Provide better and documented information to the school board and the public regarding major initiatives.	Throughout the implementation process of new school district initiatives, both the school board and the public should receive continuous updates, data, and detailed information regarding processes and implementation. · Full disclosure of data and information · Transparency	District leadership remains in ongoing communication with the Board of Education, academic leadership, and the communications team regarding any potential adjustments related to this topic. A timeline calendar was created to outline when key decisions need to be made by stakeholder groups, including the board, in order to inform families of any changes in transportation, boundary changes, etc. at the JCPS Showcase of Schools, prior to the enrollment application window. This timeline was shared with key leadership stakeholders including the JCPS BOE and JCPS Communications. Separately, data and KPIs are routinely presented to the board and shared with the public.
6-3	Evaluate the potential for implementing greater depot use.	The transportation department should assess each choice zone independently and determine whether depot usage could reduce run time, both given the current SSTs and given ideal SSTs. · Where logical, and where the number of buses involved in a depot is small, staff may recommend that it be placed somewhere other than the historical depot locations. · Staff may also find that it can combine buses from choice zones without the need for depots. "While doing this work, the transportation department should assess whether there is inefficient use of depots currently in the system, as alleged by some principals.	This work has been successfully completed, culminating in a comprehensive and transformative overhaul of the depot system. In light of the complexities surrounding grandfathering and the choice zone, we have strategically implemented direct runs wherever feasible to enhance efficiency and clarity.

STAGE 2			
#	Recommendation	Suggested Action	JCPS Progress/Response
3-1	Develop systems to collect and report Key Performance Indicators (KPIs)	Collect, study, and share KPIs with a broad spectrum of stakeholders and all transportation department leadership. · KPIs typically include accidents, costs, inclusion of classified students on general education buses, complaints, on-time performance, actual ridership vs. bus capacity, spare bus availability, bus fleet stage, bus inspections, driver turnover, and more. To being, JCPS should select no more than 5 material KPIs. · These should include (1) on-time to school performance, (2) driver absenteeism, and (3) driver turnover. The status of KPIs should be communicated with: · Drivers/attendants on the daily · All transportation staff at bi-monthly meetings (which should include analyses by bus compound) · Leadership (including the school board) at least quarterly until on-time performance reaches and acceptable level, then at least annually.	We are currently collecting, analyzing, and sharing key KPIs in alignment with this guidance. These metrics, such as on-time performance, driver absenteeism, and turnover, are being shared regularly through appropriate channels but will start sharing these KPIs with more intentionally with drivers than previously done.
3-2	Establish operational expectations via the development of a transportation operations manual and explicit professional development covering key job performance areas.	Should include all essential pupil transportation tasks, including timelines and deadlines, for all department leaders. *Professional development for bus compound coordinators and more should include regular participation in industry conferences regionally and nationally. *Get involved in professional organizations and utilize available resources to construct a comprehensive manual. *All compound coordinators and more should be expected to participate in professional development outside of district offerings.	Progress is being made towards a goal of completion of a transportation operations manual by the end of this school year. Compounds have been provided with expectations and guidelines on how to accomplish essential tasks. At this time, participation in industry conferences is still being reviewed for coordinators/assistant coordinators. That being said, professional development opportunities have been expanded for trainers.
3-3	Readdress and revamp the district's approach to student conduct on its school buses.	The district should assign climate and culture department staff members to work full-time at the bus compounds. These staff members should be expected to: · Leader driver/attendant trainings on positive bus behavior management. · Interact directly with bus drivers to collect referral slips, input the data, and provide daily updates on the consequences given. · Analyze data by bus route, bus driver, time of day, school, and student (at a minimum) to identify patterns in order to determine areas in need of focus. · Review videos from school buses to help schools investigate bus referrals and to identify unreported behavior problems. · Complete ride alongs on buses at least weekly to support the development of positive bus behaviors. · Lead training sessions with younger students on how to properly ride the bus. · Monitor the treatment of bus drivers by school staffs	Climate and Culture staff has been assigned to each compound. Their primary responsibility is to collect bus referrals and enter them into our data system. They can also communicate with drivers to address concerns and share issues with school administrators. As behavior consultants, the assigned staff also provide best practice resources for bus drivers at the compounds as needed. All bus drivers receive PBIS and Trauma Informed Care training annually. Compound coordinators have daily access to a behavior data sheet that highlights consequences assigned to students for bus referrals. This information can also be accessed by assigned Climate and Culture staff. Bus data review occurs each month in collaboration with Climate and Culture, the ECE Department, and Transportation staff to review school, bus, compound, and student level bus referral data. Transportation resources within the Student Support and Behavior Intervention Handbook have been expanded to include additional expectations and procedures for administering discipline on the bus. This has been added to our website and included in our communication outlets. Climate and Culture has provided supplementary resources (videos and slide decks) that schools can utilize to assist in training students on bus expectations at the beginning of each year. The district has expanded its capacity and ability to review bus footage. Bus footage is regularly accessed by school and district leadership to identify and review potential bus violations. The transportation department conducts surveys several times throughout the year for feedback to schools. It should be noted, many of these procedures were in place prior to the initial

		· Develop compound-level reports of bus discipline statistics that are then shared with the school board and the public.	transportation audit.

STAGE 2			
#	Recommendation	Suggested Action	JCPS Progress/Response
3-4	Collaborate with school principals to develop site-specific plans to expedite the entry and dismissal of buses during both morning and afternoon schedules.	In each school's traffic circulation plan, buses should come first. Each JCPS school should: 1. Develop and communicate clear procedures outlining the priority of bus arrival and departures over student drivers, parents, student walkers/bikers, and staff transit. If necessary due to the site layout, all other forms of transit to/from campus should be held until buses have rolled. 2. Designate dedicated bus lanes or loading zones at school entrance to facilitate smooth bus flow, and coordinate with local authorities to enforce regulations prioritizing bus movement during school hours. 3. Promote alternative transportation modes like walking, biking, or carpooling to reduce private vehicle traffic. 4. Monitor and evaluate campus bus operations, traffic patterns, and stakeholder feedback to make necessary adjustments for new processes. Transportation department should monitor the success of each school's efforts and work with school staffs as needed to support improvements.	In response to the audit recommendations, JCPS has implemented several measures to prioritize bus operations and improve school traffic flow. Principal supervisors reviewed and approved all start-of-school plans with explicit attention to bus arrival and departure, ensuring consistency across schools. Bus lanes and loading zones were re-marked with support from the operations team, and our internal police partnered with local authorities to assist with traffic management during arrival and dismissal. To better manage transportation demand, families completed the Transportation Verification platform at a rate of over 90%, providing clear data on student transportation choices. Finally, building leaders submitted feedback during the first days of school, which was reviewed by the School Division team to identify successes, address challenges, and adjust procedures. These actions demonstrate our commitment to safety, efficiency, and continuous improvement in transportation operations.
3-5	None	N/A	
3-6	Develop an interdepartmental/interdivisional strategic plan specific to districtwide bus driver retention.	JCPS executive leadership should appoint a director from 1 of the divisions of operation or HR or from the departments of student transportation or communications to lead other professional members of an appointed team from operations, HR, communications, and student transportation. The team should also include representative number of bus drivers and bus attendants. The team should produce a written, research-based, 2-year plan that addresses factors known to impact bus driver retention, including but not limited to: · Vision · Mission · SWOT Analysis (Strengths, Weaknesses, Opportunities, and Threats) · Core Values · Goals · Objectives · Action Plans	After consideration, the department decided not to proceed with implementation due to a concerted team effort of HR, transportation, and the district. As a result of a negotiated agreement with Teamsters 783, there has been a dramatic increase in driver wages. This fact, coupled with hiring blitzes conducted by HR has led to an increase in driver numbers. From July 1, 2024 through August 1, 2025, we have certified approximately 167 new bus drivers. Our overall driver count has increased from 534 drivers to 662 drivers. An analysis of driver stats reveal that the greatest number of drivers leaving are aged 55 and over. This particular age group accounts for a little more than 58% of driver separations, with the number one reason for exiting being retirement.
3-7	Investigate ways and means to reduce the time that HR takes between receiving a bus driver online application and it being available to those in student transportation who conduct the employment interview.	Designate an HR professional position to devote work time exclusively to the application and eligibility review process of bus driver applicants. · Should be charged w/ exploring all ways and means to mainstream each application and expedite selected candidates for CDL classes. · Should access applications on a daily basis and ensure applicants are scheduled for the initial visit to the HR Welcome Center to begin paperwork.	HR has implemented multiple ways for applicants to schedule an appointment with the Welcome Center, including adding the Google scheduling form on the job posting and in the application itself, and sending an automated email reminder to the applicant. The HR assistant assigned to the HR Operations team is the point of contact for reviewing eligibility and checking routinely to ensure that applicants are scheduled for the initial visit to the Welcome Center. The clerk for the HR Operations team reviews applications daily to identify those complete. Also, a Welcome Center team member is dedicated solely to the onboarding of bus driver applicants and reviews applicant files with assistance from other Welcome Center team members.

3-8	Assign buses to routes in the same geographical areas as their compounds to the greatest extent possible.	JCPS should regularly review and adjust route assignments in line with shifts in student population and urban development.	All routes were revisited and realigned given the current tier system and geographical locations. Progress is being made towards a goal of 100% mirroring. Given existing resources and programmatic school schedules, we were able to revert to approximately 75% mirroring for this school year. Approximately 90% of the routes operate in an acceptable geographic region with proximity the home bus compound.

STAGE 2			
#	Recommendation	Suggested Action	JCPS Progress/Response
3-9	Establish, communicate, and enforce a deadline for route change requests from parents.	The district should have a deadline for parental stop change requests of at least 2 weeks prior to the start of school and for 2 weeks after the start of school.	The transportation/operations annual calendar has been approved by the BOE, implemented, and communicated to operations, academic stakeholders, and Communications. It contains change variables such as student assignment decisions, school start times and new programming. The routing season schedule is outlined with open entry windows, deadlines, a pause period, driver simulations and public opening of bus route information. Compounds and drivers are notified electronically regarding new bus stops. Compounds and drivers work to provide their own direction sheets as they have up to 48 hours to review changes and practice them. A visually improved calendar is being created this year to increase clarity of these deadlines for departments and parents/guardians. The improved calendar will again be shared with Communications.
3-10	Adjust the routing calendar to allow drivers to complete initial dry runs, provide feedback, and then dry run the revised routes.	JCPS should: 1. Design the new routing calendar w/ sufficient time between route assignments and the start of the school year so that drivers have enough time for thorough dry runs. 2. Designate specific periods for drivers to conduct dry runs at various times of the day to account for different traffic conditions and potential hazards. Dedicated time slots should be integrated for drivers to document and submit their observations and recommendations following their dry runs. 3. Develop a systematic feedback process with standardized feedback forms for drivers to report their findings and suggestions systematically. Clear channels for submitting feedback, whether through digital platforms, paper forms, or in-person meetings, should be established. 4. Staff a team to analyze the feedback from drivers and incorporate feasible suggestions into the final route adjustments. 5. Establish regular communication channels between drivers and the transportation department to address new/ongoing route issues and ensure continuous feedback collection. 6. Provide drivers with periodic training to equip them with the skills needed to identify and report issues with routes and safety effectively.	The transportation/operations annual calendar has been approved by the BOE, implemented, and communicated to operations and academic stakeholders. It contains change variables such as student assignment decisions, school start times and new programming. The routing season schedule is outlined with open entry windows, deadlines, a pause period, driver simulations and public opening of bus route information. Compounds and drivers are notified electronically regarding new bus stops. Compounds and drivers work to provide their own direction sheets as they have up to 48 hours to review changes and practice them. A visually improved calendar is being created this year to increase clarity of these deadlines for departments and parents/guardians. Driver feedback is already currently collected, analyzed, and shared appropriately to respond to needed changes. Drivers have several communication channels to report concerns regarding routes, work conditions, etc. and even including, concerns with their own supervisor. Feedback loops and communication are in place to address needed change. Drivers already receive ongoing training throughout the year including safety and behavioral tips and tricks.

3-11	Complete the creation of a full, centralized routing department.	Finish staffing the new routing department: · A supervisor (filled) · 2 lead routers—each would supervise a team of 3 routers · 6 routers Primary responsibility is routing. The team should be equipped with advanced computerized routing software to analyze and optimize bus routes based on real-time data, including traffic patterns, road conditions, and student distribution. The routing department should develop comprehensive written guidelines for bus stop creation, specifying clear criteria for the place of stops based on safety, accessibility, and efficiency. · Should also outline appropriate walk-stop distances. · Should also include a systematic process for identifying and documenting hazards that would prevent the implementation of walk zones, such as busy intersections, lack of sidewalks, or high-crime areas.	A fully developed centralized routing team is in place. The team consists of a routing supervisor, 2 lead routers, 5 specialist routers, and administrative support. Progress is being made towards the written guidelines goal for routing stops. After an extensive search and vetting process, a routing software has been purchased. Implementation is being phased in over a multi-year approach. This school year, only the special needs routes are in the new routing system so that the system components can be tested to flush out and resolve any issues. By the start of the of the 2026-2027 school year, full implementation will occur. Work is in progress on a written public set of guidelines for bus stop placement considerations including walk-stop distances as well as identifying and documenting hazards that would prevent the implementation of walk zones, such as busy intersections, lack of sidewalks, railroad crossings, or high-crime areas.

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#	Recommendation	Suggested Action	JCPS Progress/Response
3-12	Communicate all late buses and coverages via the district website.	Staff in the transportation department should work with those in the IT department to develop a process to identify and report all late buses. All late buses should then be reports to schools and the general public via the district website.	After consideration, the department decided not to proceed with the implementation due to the fact that on-time service has improved dramatically. Approximately 99.9% of students now arrive on time for instruction. The remaining .1% is often times due to the factors outside of our control - i.e. traffic, accident or train stoppage.
3-13	Adjust the maximum assignment allowed within the timekeeping system for bus drivers to be 12 hours per day.	Transportation department should request that the JCPS IT department update T&A to allow for the actual contract hours to be loaded. This will require reprogramming and testing of T&A to ensure that the improvement propagates correctly through what they terms "a very old application."	The 2024-2029 Agreement between JCPS and Teamsters calls for all employees covered under this agreement to be paid for 8 hours each work day. An 8-hour workday is automatically loaded into the payroll system via a designation of "present" that is inputted by each compound.
3-14	Revamp the driver breakroom areas of most of the bus compounds.	Driver break rooms should have: 1. Functional appliances, including coffeemaker, microwave, and ice machine 2. A variety of comfortable seating options 3. A computer with internet access available for driver use 4. Sufficient number of power outlets for drivers to charge their devices 5. Clean, uncluttered appearance 6. Intentional, professional decoration 7. Digital signage to impart daily updates, including progress against KPIs 8. Organized and updated displays of needed information 9. Staff recognition space	Progress is being made revamping the break room area in bus compounds. All have functional appliances; however, due to layout and space restrictions, it is not possible to include a variety of seating options. Computer access in the break areas is still being assessed. A summary of bus compound renovations include common tasks completed across all sites such as: lighting upgrades to LED, VCT or carpet tile replacement, cabinets & countertops replacement with new sink and faucet upgrades, ceiling tile replacement, interior and exterior painting, ice machine installs, circuit additions for stoves, wall construction, and other miscellaneous tasks.

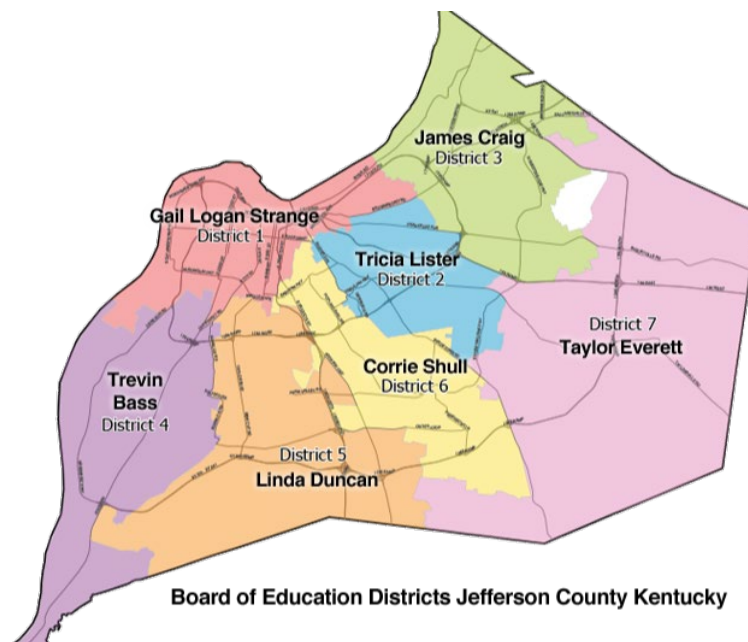
3-15	Develop a balanced scorecard approach to set realistic maintenance department goals against established KPIs.	JCPS should select no more than 5 material KPIs to begin for the vehicle maintenance area. Recommended: · Maintenance cost per bus · Preventative maintenance inspections completed on-time · Fleet availability · Mechanics per bus · Maintenance hours per bus The status on all KPIs should be communicated with: · Bus compounds—WEEKLY via prominent display in the bus compound breakroom areas · All transportation staff during the BI-MONTHLY communications meetings, which should include analysis by bus compound · Leadership (including the school board) at least ANNUALLY	Vehicle maintenance KPIs are currently in use and are being shared with leadership and relevant departments, as appropriate. However, more targeted and relevant KPIs, such as driver performance indicators, will be provided to bus compounds in place of maintenance-focused metrics.

STAGE 2			
#	Recommendation	Suggested Action	JCPS Progress/Response
3-16	Address the maintenance staffing shortage.	JCPS should address its maintenance staffing shortage in multiple ways: 1. Develop an outreach program to market district employment opportunities to those leaving the military from Fort Campbell and Fort Knox. The primary focus should be soldiers possessing 91B (Wheeled Vehicle Mechanic), 63B (Light-Wheel Vehicle Mechanic), or 63S (Heavy-Wheel Vehicle Mechanic) certifications. 2. Implement a hiring bonus for qualified technicians. 3. Issue an RFI to explore options for outsourcing white fleet maintenance. It is likely that white fleet maintenance can be outsourced at the same or lower cost than required using in-house staff. This would free the mechanics to focus on the more important job of bus maintenance. 4. Complete a wage comparison analysis within the locality to ensure the district is paying competitively for mechanics. The district should adjust base as needed to remain competitive. 5. Adopt a night pay differential for all 2nd shift workers. Retaining an evening work force and incentivizing potential evening shift workers often requires a pay differential. The transportation department should develop a pay differential for its 2nd shift. Employees who spend at least two-thirds of their workday beyond 4:00 pm should be entitled to a night differential. Prismatic recommends a minimum of a 5% differential. 6. Provide employee recognition in the form of a Vehicle Maintenance Technician of the Month (EOM) and a Vehicle Maintenance Technician of the Year (EOY). The EOM recognition program winner could receive a \$50 restaurant gift card from a local business stakeholder. The EOY recognition program winner could receive an opportunity to attend the Kentucky Association for Pupil Transportation (KAPT) Annual Conference. Recognized employees should be featured in district social media.	Progress has been made towards a goal of increasing the number of Mechanic applicants, specifically veterans. Visits to Ft Knox occur twice a month. We work closely with the Transition Assistance Program (TAP), which connects with soldiers and their spouses within a month of finishing their contract to learn about employment opportunities within JCPS Fleet Maintenance and other Operations divisions. Mechanic positions are listed in various sites including but not limited to: LinkedIn, Temp-A-Vet (Military), Indiana Career Connect (Indiana Vets), Team KY monthly virtual fairs, KCC monthly virtual fairs, Building Talent Foundation (Military), Career Skills Program Ft. Knox (Military), Louisville Urban League, and KY Valor (military). Career Skills Program or CSP would allow for free labor from a Ft. Knox mechanic for 90 days. This allows the soldier to work in their field of choice and allow them to "test" the market for potential employment. It is understood that no contract nor a promise of a job will be made to the CSP candidate. They are paid by the military. We currently have 2 CSP Teachers getting ready to start. With regards to referral bonuses, hourly employees who recommend a Mechanic and they work for "x" amount of days would receive the referral bonus. Currently there is no limit for bus driver referrals for one person.
3-17	Transfer control of the spare parts inventory to the vehicle maintenance department.		
3-18	Work towards a fleet focused on 1 school bus manufacturer.	The manufacturer should be selected based on the best value in workmanship, reliability, technical support, accessibility and maintainability. JCPS should form a selection committee comprised of the transportation director, vehicle maintenance manager, coordinator, foreman and maintenance technician. The committee should then: * Establish a written scoring matrix based on best value in workmanship, reliability, technical support, accessibility and maintainability; * Score manufacturers in key areas by rank order to determine the winning manufacturer; and * Report out to JCPS leadership and	There are two bus manufacturers that provide service in the Louisville area: Thomas Bus and IC Bus. Our district currently maintains a fleet that includes models from both manufacturers. Each year, both companies submit specifications and pricing for state approval, ensuring compliance with regulatory standards and providing transparency in procurement. Bus purchases for our district depend on current and future budget allotment. Maintaining relationships with both manufacturers offers strategic advantages for our district. It allows us to remain flexible in our purchasing decisions by comparing features, pricing, and availability between vendors. This competition encourages better pricing and service, helping us make the most of our current and future budget allotments. Additionally, having a diverse fleet can reduce operational risk in the event of supply chain delays, part shortages, or service disruptions from a single manufacturer. By leveraging the strengths of both companies, we are better positioned to meet the evolving

		begin the procurement process in 2025-26	transportation needs of our students and community.

STAGE 2		
#	Recommendation	JCPS Progress/Response
3-19	Expand the use of MUNIS-generated blanket purchase agreements for repair parts to expedite the repair and maintenance of school buses.	JCPS should: *Review the maintenance work history of the spare bus fleet. *Determine which buses are candidates for auction/scrap metal sales based on miles, cost per bus and age. *Conduct a controlled exchange of bus parts with a longer time horizon, swapping out parts such as tires with less wear on buses slated for auction onto buses still in use. *Additionally, if reorder points are used by the spare parts department, the amount of stock at 0 balance should be minimal. This would also reduce the amount of cyclical maintenance required for the spare fleet.
3-20	Adopt and adhere to a formal bus replacement plan.	The current plan is to replace buses when they reach 14 years of age; however, due to budget cuts, we have not had adequate funding for the past several years. There is currently no funding available for replacements this year to date.

APPENDIX E: JCPS SCHOOL BOARD DISTRICT MAP



Source: Jefferson County Board of Education. "Board Member District Map". Retrieved December 14, 2025.
<https://www.jefferson.kyschools.us/page/board-of-education>

APPENDIX F: JCPS SOFTWARES AND APPLICATIONS

JCPS - Softwares and Applications

Product	District/School	Who Uses Product	Description
3C Institute		Staff Only	3C Institute develops and disseminates evidence-based interventions and technology to promote social, emotional, and mental health.
ATI/TC Certification Exams	School Available	Students Only	ATI certification exams are industry-validated assessments designed to measure real-world business skills and knowledge.
AAAFCS Pre-Professional Assessment and Certification	School Available	Students Only	Pre-PAC is a national program offering standards-based assessments and industry-recognized certifications in Family & Consumer Sciences.
Abdo Books	School Available	Staff Only	ABDO is a leading educational publisher of books and digital resources for today's libraries and schools.
Absence Management Integration	District Provided	Staff Only	Identifies data discrepancies and validates information compared to Muris data. Provides control of data by allowing access to make-keyed data prior to import. Flags potential areas of concern for quick flow. Eliminates transferring TIF files between the systems.
Adobe	School Available	Staff Only	Adobe Suite of products for staff that are not explicitly allowed for students.
Adobe Captivate	School Available	Staff Only	Adobe Captivate is a learning authoring software that enables the creation of interactive, multi-device mobile learning content without programming.
Adobe Creative Cloud for Education	School Available	Both	Creative Cloud apps address a full range of communication needs and share a common interface, so it's easy to use them across all types of classes.
Adobe Creative	District Provided	Staff Only	Adobe Creative enables educators to produce engaging digital content such as graphics, videos, animations, and presentations. It provides digital literacy, creativity, and critical thinking skills essential for modern education. Additionally, it supports district-wide communication, marketing, and professional development efforts.
Adobe Signware for Education	District Provided	Both	Quickly and easily make amazing graphics, images, and videos with thousands of education templates.
Advanced Fleet Maintenance	District Provided	Staff Only	Fleet maintenance software for school bus maintenance.
Agilis CLM	District Provided	Staff Only	Central office only - Contract Lifecycle Management Software
AgricultureU	School Available	Both	Standardized, turn-key, fully-customizable, activity-based courses.
Air Aviation Seminars of America	School Available	Both	ASA (Aviation Supplies and Academics) provides aviation training materials and pilot supplies, evolving from a post-war pilot training school in 1940.
ALERS	School Available	Both	A web-based, artificially intelligent assessment and learning system.
Apptitude	District Provided	Staff Only	The Next Generation of Transportation Management
Amplified IT	District Provided	Staff Only	Amplified IT is an education consultancy that helps K-12 and Higher Ed institutions leverage Google for Education and Google Cloud technologies.
Amplified IT Admin Tools Unlimited	District Provided	Staff Only	Amplified IT is an education consultancy that helps K-12 and Higher Ed institutions leverage Google for Education and Google Cloud technologies.
Amplify	School Available	Both	Amplify creates K-12 core and supplemental curriculum, assessment, and intervention programs for today's students.
Anatomage Table	School Available	Both	The Anatomage Table is a 3D anatomy visualization and virtual dissection tool used for anatomy and physiology education, offering highly accurate digital cadavers.
AP Classroom	School Available	Both	AP Classroom is software from College Board for students and teachers to access AP Class materials.
AP Classroom Lockdown Browser	School Available	Both	College Board Software required on student devices to ensure students only view test materials during the AP Exam.
AP Courses and Exams	District Provided	Both	Advanced placement classes that prepare students for college with college level material and concepts.
Apple Music	School Available	Staff Only	Music, audio, and video streaming service for users.
Apple Remote Desktop	School Available	Staff Only	An app that manages the Mac computers on your network.
Applied Digital Skills	School Available	Staff Only	Google's ready-to-use video lessons teach digital skills that have immediate, real-life application.
AppointmentPlus	District Provided	Staff Only	The Smarter Online Appointment Scheduling Solution
Appology	District Provided	Staff Only	Helping K12 leaders build a powerful identity for their schools
Appology Threatware	District Provided	Staff Only	Threatware is a communication platform that helps schools manage their online interactions across web, mobile, social media, and alerts.
ArcGIS	District Provided	Staff Only	Geographic Information Systems software - Central Office Only
Arty	School Available	Staff Only	Arty is a comprehensive youth programming solution that equips schools, YMCAs, and community organizations with management tools and evidence-based content for high-quality programs.
Articulation Station Pro	District Provided	Staff Only	Articulation Station is a comprehensive articulation therapy app designed by a speech-language pathologist for speech sound practice at various levels.
ASE Test Prep	School Available	Both	ASE Test Prep provides online ASE practice tests to help automotive technicians prepare for certification exams.
Augmented Reality Welding System	School Available	Both	Industry standard welding simulation tool for classroom training.
Autodesk Certified User	School Available	Students Only	Proven Exam for certification in Autodesk Tools.
Autodesk Maya	School Available	Both	Professional 3D design software for creating characters and special effects.
Autodesk Meshmixer	School Available	Both	3D design software for adapting 3D prints and 3D scans.
Autodesk Revit	School Available	Both	Building Information Modeling software. 3D design.
Avant STAMP Language Proficiency Assessments	School Available	Both	It enables teachers to be effective in improving proficiency outcomes, and empowers administrators to make better-informed decisions about curriculum and teacher training by delivering accurate data on students' proficiency levels.
Avant AAC - Lifetime Edition	School Available	Staff Only	A fully featured speech app that also includes a training module for new AAC users & caregivers.
Axon	School Available	Staff Only	Public safety technology, training and software for a safer world
Azure	District Provided	Staff Only	
Babel	School Available	Staff Only	Uses empirically-proven techniques to teach languages, offering over 50,000 lessons across 14 languages.
Backpack for Google Drive		Both	
Barto	School Available	Staff Only	Barto's veConnect enables wireless presentation and collaboration for a campus-wide BYOD experience, promoting active learning and interactivity.
Base Education	School Available	Both	Provides online Social Emotional Learning (SEL) curriculum for students in schools and mental health systems.
BeetMARC	District Provided	Staff Only	BeetMARC is a comprehensive cataloging and MARC records management tool, helping librarians maintain accurate bibliographic records. It tracks sessions, searches, and records added, edited, imported, or exported, ensuring collections remain organized, current, and accessible.
BeyondTrust	District Provided	Staff Only	BeyondTrust provides a comprehensive Privileged Access Management (PAM) solution for controlling and monitoring privileged accounts and users across various platforms.
BeyondTrust Support	District Provided	Staff Only	BeyondTrust provides a comprehensive Privileged Access Management (PAM) solution for controlling and monitoring privileged accounts and users across various platforms.
Biosome World	School Available	Both	BIOZONE creates visual and engaging learning resources to help students understand science, with a focus on up-to-date information and real-world applications.
Blackboard Learn	School Available	Both	Blackboard Learn by Anthology is a Learning Management System (LMS) designed to enhance learning experiences, support collaboration, and improve learner outcomes.
Blogger	School Available	Staff Only	BlogWeb Creation tool for keeping thoughts for commentary or professional journalism.
Blooket	School Available	Both	Blooket is a game-based learning platform that offers various unique game modes where students answer questions to compete and earn rewards.
Bluebook Exams	School Available	Students Only	This software update provides support for various SAT and PSAT testing formats, including features like the score reader, a line reader tool, and device security enhancements.
Blue IDE	School Available	Both	Blue is a development environment that allows you to develop Java programs quickly and easily.
Boardmaker 7	School Available	Both	Boardmaker 7 is the premier tool to help educators create, edit and share learning materials.
Book Creator	School Available	Both	Book Creator is a simple content creation tool that allows you to create, read and publish student work, or create materials such as differentiated lessons, school newsletters or staff manuals.
Bookings	District Provided	Staff Only	Microsoft Bookings is an appointment scheduling app that helps you keep track of your bookings, your staff and your customers.
Boom Cards	School Available	Both	Boom is the ultimate workshop for learning. With over 500,000 auto-grading, interactive, learning activities, teachers save time and get a boost in student engagement.
BoomerV	School Available	Both	Boomer Schools promotes economic growth in Kentucky by creating tech ecosystems that support entrepreneurship and job creation through curriculum, coding, and startup development.
Boundwork	School Available	Staff Only	Boundwork is a digital health platform that delivers wellness-focused professional development to K-12 educators.

Product	District/School	Who Uses Product	Description
BusinessU	School Available	Both	Our turn-key curriculum is standards-based, activity-based, and has been designed and vetted by business and industry professionals. BusinessU supports business education, high school business education, project-based learning, standards-based business curriculum, web-based curriculum, web-based learning, distance learning, e-learning, and is mobile friendly.
BusinessU	School Available	Both	Standard-designed, turn-key, fully-customizable, activity-based courses.
Cerve	District Provided	Both	Cerve for Education aims to provide teachers and students with the tools they need to create visually engaging learning experiences, fostering creativity and enhancing communication.
Capt Access	School Available	Both	Inform instruction and intervention with ETS ReadTests and other assessments.
Care Solve	District Provided	Both	Assists individuals and families find mental health and substance use treatment providers.
CASAS eTests	School Available	Both	CASAS eTests provides cost-effective, computer-delivered assessment options.
Cadlight	District Provided	Staff Only	Health navigation platform that helps employees understand and manage their healthcare benefits. (Provided via KDC)
Cengage Group	School Available	Both	Cengage is used to provide digital learning resources and support for both students and teachers. The platform offers access to eTextbooks, online learning materials, and interactive tools.
CERT - College Equipped Readiness Tool	School Available	Both	An assessment tool designed to help students and educators evaluate college readiness by assessing students' academic skills, study habits, and personal attributes to identify areas for improvement.
Certified Hospitality and Tourism Management Professional (CHTMP)	School Available	Students Only	Portable professional certificate for individuals interested in the hospitality industry.
CEV	School Available	Both	CEV specializes in providing curriculum and educational resources for the subject areas of Agricultural Science & Technology, Business & Marketing, Family & Consumer Sciences, Trade & Industry and Career Orientation.
Class Dojo	School Available	Both	ClassDojo is a global community of more than 50 million teachers and families who come together to share kids' most important learning moments, in school and at home—through photos, videos, messages, and more.
Coaching Effect Survey (CES)	School Available	Staff Only	Essential Institute provides leadership training and the Coaching Effect Survey (CES) to measure and improve coaching effectiveness, resulting in enhanced team performance.
CodeIt!	School Available	Both	Coding and Computer Science Platform for K-12 Schools
College and Career Ready Lab	School Available	Both	For postsecondary success, STEM, Health Science, Construction, Tools & Equipment.
Compex	School Available	Both	Web and mobile programs for Social & Emotional Learning, Character Development, and Intervention/Restorative Practices.
DB/TextWorks	District Provided	Staff Only	This database is Archiver's primary tool for storing data, loading records, and tracking searches and box locations. It provides electronic document access, physical item locations, and tracks records requests by type, such as student or personnel records.
EDPlan	District Provided	Staff Only	EDPlan is a suite of tools from PGC designed to support student success in special education, academics, and behavior through collaborative planning.
EducatorView	District Provided	Staff Only	Provides standards-based data solutions for educator candidate management and program reporting, aimed at improving educational outcomes.
Edug	District Provided	Both	Edug Parent Portal, a mobile app that allows parents to access real-time and planned transportation data for their children. This includes bus locations, stop changes, and alerts, helping parents stay informed about their child's transportation.
EPES Web Accounting	District Provided	Staff Only	A web-based accounting program offering secure, accessible financial management for schools, with features like automatic backups, district-level reporting, and online payment integration.
epocrates	District Provided	Staff Only	epocrates is a medical reference application providing updated clinical content to healthcare professionals since 1996, known for its early adoption on the iPhone.
Fast ForWord	School Available	Both	Fast ForWord is an adaptive online reading program that uses learning science to improve literacy, cognitive, and social-emotional skills for struggling readers.
Firewalled repli	School Available	Both	Firewalled version of Repli, a software development tool, that prevents students from connecting to resources that are traditionally blocked on the JCPS network, but available through normal Repli.
Formative	School Available	Staff Only	upload any pdf/document/google doc, click to add places for your students to respond, edit any question details and you're done
Freestyle Libr	School Available	Both	Continuous Glucose Monitoring
Frontline Absence and Substitute Management Software	District Provided	Staff Only	Proactively manage employee absences, substitutes, and time and attendance—all in one software system with Frontline Absence & Time.
FTX Adaptor	School Available	Staff Only	■ TPC Solution is an all-in-one workforce management training platform.
Fusion	School Available	Both	Integrated CAD, CAM, and CAE software
Fusion 360	School Available	Both	G-W Online provides a comprehensive collection of learning for students and a full support solution for instructors.
G-W Online Textbooks	School Available	Both	Database of encyclopedias and reference sources within the Gale eBooks platform. For multidisciplinary research.
Gale eBooks	District Provided	Both	Gale in Context: For Educators the seamlessly into existing workflows and offers educational resources for teachers as well as tools to support differentiated learning and cross-curricular efforts.
Gale in Context	District Provided	Staff Only	Gartner Executive Programs provide exclusive membership for CIOs and senior IT leaders, offering insights, networking, and tools to improve business results.
Gartner Membership	District Provided	Staff Only	K-12 Math & Science Lessons
Generation Genius	School Available	Staff Only	Royalty free images
Getty Images	District Provided	Staff Only	GMets offers practice tests and e-learning for the following certification programs: MOS, MTA, IC3, ACA (Adobe), ACU (Autodesk), QBCU (QuickBooks) and CompTIA.
GMets	School Available	Both	Blood pressure camera software used for CTE courses in health services.
Go Direct Blood Pressure Sensor	School Available	Both	Ticket selling software for purchasing digital tickets to high school athletic events.
GoFan	School Available	Staff Only	Suite of educational software tools designed to help schools create safe and engaging learning environments by offering features like content filtering and classroom management.
GoGuardian Teacher	School Available	Staff Only	Insights into application usage/engagement
GoGuardian Teacher	District Provided	Staff Only	Virtual museum tours
Google Arts and Culture	District Provided	Staff Only	Online library
Google Books	District Provided	Both	Google's internal browser
Google Chrome	District Provided	Both	Google Computer Science platform ensuring equitable access to Computer Science programming and instruction.
Google CS First	District Provided	Staff Only	Build interactive data dashboards
Google Looker Studio	District Provided	Both	Make your own website with customizable templates and easy attachments.
Google Sites	District Provided	Both	Export data from your Google account.
Google Takeout	District Provided	Students Only	Google Translate is a free service that instantly translates words, phrases, and web pages between English and over 100 other languages. It supports text, speech, handwriting, and image translations, making it a versatile tool for communication.
Google Translate	District Provided	Both	In JCPS, Google Translate is used to support Multilingual Learners (ML) and their families. It helps translate important information, resources, and communications into various languages, ensuring that non-English-speaking students and parents can access and understand educational materials.
Google Workspace	District Provided	Both	Google Workspace for Education is a collaborative suite for educators and learners, which includes products such as Google Classroom, Meet, Google Docs, Sheets, Slides, and Google Drive.
GoTalk Now	District Provided	Both	Alternative communication tool (ECE).
GradEd: Designing CTE Software	School Available	Both	Standard-designed VR games used in CTE pathways
GradEdam	School Available	Both	GradEdam provides 24/7 online tutoring, offering students unlimited homework help and subject support for a flat monthly fee.
Gradient	School Available	Both	Gradient (formerly GradeCam) is a comprehensive assessment solution designed to simplify and streamline the entire assessment process for educators.
Halpoint Systems	School Available	Staff Only	Halpoint Systems offers IT services and data visualization tools to help organizations manage and analyze data for informed decision-making.

Product	District/School	Who Uses Product	Description
Handshake	School Available	Self Only	Online career management system
Heart Health	School Available	Self Only	Heart Health's healthcare services provide students with access to on-demand doctor visits, at school and at home
HBCU Careers.com	School Available	Both	HBCUCareers.com connects diverse candidates with employers through online resources, career fairs, and publications, with a long history of supporting HBCU Career Services Offices.
HeadStart	School Available	Both	The program uses effective, interactive online episodes to teach K-5 students the reading fundamentals and comprehension skills they need to become successful readers.
Headly Relationship Curriculum	School Available	Both	adaptable program with lessons, visuals, videos, and activities that teach challenging life skills.
Heartland Payment Systems	District Provided	Self Only	Heartland, now part of Global Payments Inc., is one of the largest payment processors in the United States, delivering credit/debit/prepaid card processing and security technology through Heartland Secure TM and its comprehensive Heartland breach warranty.
Headwater Courses	District Provided	Both	CPS's Headwater courses.
Helm IDS Software	District Provided	Self Only	Software used for automobile diagnostics - used by JCPS operations
Hero (SchoolMint)	School Available	Both	Behavior management and attendance tracking
Herivel Packard Enterprise Support Center	District Provided	Self Only	Support software for HP printers and other products
HMH Social Studies	School Available	Both	The inquiry-based approach of HMH Social Studies asks every student to dig into history and ask detailed questions. Students learn to think critically, draw conclusions, and support those conclusions with evidence—the same skills that'll use in college and throughout their careers.
Hudl	School Available	Both	Hudl provides video analysis and performance tools for coaches and athletes, including game and practice video, data analysis, and playbook management.
Hudl Focus	School Available	Both	Hudl provides video analysis and performance tools for coaches and athletes, including game and practice video, data analysis, and playbook management.
Hydrex	School Available	Both	Sports software for swim and track meets
i-Ready	School Available	Both	The i-Ready Reading program addresses the Common Core's emphasis on close reading of complex, authentic text from a wide range of genres, while supporting students with a proven-effective, gradual-release instructional model that builds confidence. It also provides portfolio-use professional development for teachers to help them teach the Common Core Reading Standards most effectively.
i-Ready Classroom Mathematics	School Available	Both	i-Ready Classroom Mathematics is a comprehensive K-5 math curriculum designed to make mathematics accessible and engaging for all students. It combines print and digital resources to support student-centered learning, emphasizing real-world math examples and interactive activities. The program includes diagnostic tools to tailor instruction to each student's needs, ensuring personalized learning paths and measurable growth.
i-Ready Mathematics	School Available	Both	i-Ready Mathematics is an online math curriculum designed to provide personalized instruction for students of all ages. It uses diagnostic tools to assess student understanding and tailor lessons to individual needs. The program includes engaging, interactive activities that help students grasp mathematical concepts and improve their skills. Teachers use i-Ready Mathematics to monitor progress and ensure students are prepared for standards-based assessments.
IB QuestionBank	School Available	Both	Customizable IB Exam Prep Tool
IDEA	District Provided	Self Only	IDEA is data analysis software designed for audit, accounting, and finance professionals, offering tools for data import, analysis, reporting, and audit trail management.
iL Classroom	District Provided	Self Only	iL Classroom empowers teachers to spend less time building student-ready materials from scratch and more time meeting their students' needs.
Imagine Language and Literacy	School Available	Both	Our adaptive learning solution accelerates reading and language proficiency for students in grades PreK-6. Designed to supplement core literacy instruction, it provides instruction and practice in all four domains of literacy—reading, writing, listening, and speaking. As students explore and practice skills, their individualized learning sequence adapts dynamically to maximize their engagement and progress, accelerating to match a cognitive leap, or adjusting to accommodate unfinished learning.
Imagine Learning EL Education	School Available	Both	We offer a comprehensive, digital-first, core language arts program for grades K-6, in which students focus on mastery of knowledge and skills and demonstrate high-quality work while building habits of character.
Imagine Learning Illustrative Mathematics	School Available	Both	Illustrative Mathematics (IM) is a K-12 core curriculum designed to give all students equity and access to grade-level mathematics — ensuring each student is an active participant in their learning. Imagine Learning is an IM-Certified Partner.
Imagine Math	School Available	Both	Imagine Math is a rigorous, standards-rich supplemental math curriculum that adapts to the unique needs of each student.
Imagine Robotics	School Available	Both	Empower students in grades 3-6 to learn computer science in a fun, engaging, and accessible way.
Incident IQ	District Provided	Self Only	IncidentIQ is a service management platform designed specifically for K-12 school districts. It offers tools for help desk ticketing, IT asset management, facilities maintenance, and instructional materials management. The platform aims to streamline workflows, improve efficiency, and support classroom instruction by reducing technology downtime.
Infinite Campus	District Provided	Self Only	Infinite Campus is a comprehensive student information system used by schools to manage attendance, grades, schedules, and other student data. It provides a centralized platform for parents, students, teachers, and administrators to access and update records.
Infinite Campus	District Provided	Self Only	Infinite Campus is a state-mandated Student Information System required by KDE for all K-12 school districts.
Infobase eBook Collection	District Provided	Both	Purchase an Infobase eBook Collection, and own all of the eBooks in that collection—they will become a lasting part of your library's holdings.
Info-Date	School Available	Both	Picture day & yearbook software
Interorb	School Available	Both	Teachers can create On-line, End-Of-Year, and longer formative assessments with our question clusters. Students take assessments on the platform and teachers/admin can view instantly detailed reports on specific bullet points of the standards and grade level bands where students are excelling or struggling.
Into Reading	School Available	Both	Into Reading provides literacy programs for K-6 students in English and Spanish, emphasizing growth mindset strategies and leveled reading materials.
IPEDV Visualizer	School Available	Self Only	IPEDV Visualizer is software that allows users to display, record, and modify camera feeds, including document camera input, for presentations and online conferencing.
IXL Learning	School Available	Both	IXL is personalized learning. With a comprehensive K-12 curriculum, individualized guidance, and real-time analytics, IXL meets the unique needs of each learner.
Jobready WBL	School Available	Self Only	Jobready WBL manages work-based learning programs, including co-ops, internships, and job shadowing, through a centralized dashboard.
Junior Achievement Company Program	School Available	Both	The JA Company Program provides high school students with the opportunity to create and manage their own business venture, guided by community volunteers and mentors.
Kaggle	School Available	Students Only	Machine learning tool used in CTE pathways
Kami	School Available	Both	Kami is a digital learning platform designed to support various learning styles and streamline assessment workflows.
Kano Anxile	School Available	Both	Chrome extension used to keep device sleep mode on Chromebooks
KentuckyLearns	School Available	Students Only	KentuckyLearns connects job seekers (ages 16-21) with employers through job postings, resume access, and online training resources. Employers can post jobs, track training, and build company profiles.
KayBazz	Self Only	Self Only	Quick meal buzzer system
Kiddom	District Provided	Self Only	Collaborative learning platform integrating content, curriculum, messaging, and analytics in one place for schools and districts.
Klett World Languages	School Available	Self Only	Learning materials available in multiple languages.
Knowledge Lake	District Provided	Self Only	KnowledgeLake is a company specializing in intelligent document processing and automation solutions. Their cloud-native platform integrates adaptive IDP (Intelligent Document Processing), workflow automation, intelligent OCR (Optical Process Automation), and content management to streamline business processes. KnowledgeLake's technology helps organizations reduce manual labor, accelerate workflows, and improve operational efficiency.
Knowledge Matters - Virtual Business High Sch...	School Available	Both	Virtual Business (VB) High School simulations are online, browser-based tools that provide interactive curriculum for teaching business, marketing, and financial literacy.
Kygo Learning & Employment Wallet	School Available	Self Only	
KYVL - KY Virtual Library	School Available	Both	Through partnerships with colleges and universities, public libraries, K12 schools, the Kentucky Department for Libraries and Archives, and other member libraries, KYVL makes resources accessible to all registered users of more than 300 member libraries across the state. KYVL also provides courier service for the sharing of all types of resources among member libraries through stationary loan. KYVL went online in the fall of 1999.
Language Testing International	School Available	Both	Certify language skills anytime, anywhere. With remotely monitored proficiency solutions from Language Testing International®, you can conveniently test language proficiency in over 120 languages from home or the office.
LanguageLine	School Available	Self Only	Connected to a professional interpreter 24/7 in 240 languages.
LDS Photography	School Available	Both	Photography vendor for student photos. Virtual offering of student photographs meet with district requirements for holding student data.
Leader in Me	District Provided	Self Only	Leader in Me is an evidence-based, comprehensive model that builds leadership and life skills in students, creates a high-trust school culture, and lays the foundation for sustained academic achievement.

Product	District/School	Who Uses Product	Description
Learning A-Z: Reading A-Z	School Available	Staff Only	Thousands of downloadable, projectable, printable teacher materials, covering all the skills necessary for effective reading instruction.
LearnPlatform	District Provided	Staff Only	LearnPlatform is a research organization that aims to provide equitable access to effective teaching and technology for students.
LEGO Spike Prime	School Available	Both	LEGO programming software used in robotics.
Levelled Bookroom Accelerator	School Available	Staff Only	Scholarly Levelled Bookroom provides leveled reading materials and instructional resources for differentiated instruction in grades K-6, including digital management and search tools.
Lexia : PowerUp Literacy	School Available	Both	Lexia PowerUp is a personalized literacy program for grades 6-12, designed to address reading skill gaps and improve academic success through structured literacy.
Lexia Core5 Reading	School Available	Both	Lexia provides a research-based, personalized reading program that targets skill gaps with explicit instruction and data-driven teacher resources.
Lexia English	School Available	Both	Lexia English is a program designed to help Emergent Bilingual students in grades K-6 develop English language proficiency through speaking, listening, and grammar instruction, aligned with language standards.
Lexmark Translation Assistant	School Available	Staff Only	Real-time document language translation.
LibGuides	District Provided	Both	LibGuides is a web-based platform for Library Media Specialists to organize and share resources, research tools, and instructional content. Usage data, including page views and engagement.
Library World	District Provided	Both	Library World is a comprehensive library management system providing seamless access to the school library catalog via OPAC. It tracks usage, search frequency, and circulation data, helping librarians manage collections and optimize services for students and educators.
Library Solution	School Available	Staff Only	TLC's library automation system offers user-friendly interfaces designed for ease of use and learning for both staff and patrons.
LibriLinkup	School Available	Students Only	Used in conjunction with FreeStyle Libre (Continuous Glucose Monitoring).
LitTouch National School Pictures and Yearbooks	School Available	Both	LitTouch provides school photography services, including Picture Day and yearbook creation.
Lighthouse Classroom Management	School Available	Staff Only	Classroom management tool that allows teachers to monitor and notify students Chromecast links.
LiveSurvey	School Available	Staff Only	LiveSurvey is the simple, quick and anonymous online survey tool.
Linkedin	District Provided	Staff Only	Networking site for professionals.
LiCamp	School Available	Both	LiCamp is a literacy program that provides standards-aligned lessons, literature, group activities, and independent reading time.
Lojo	District Provided	Staff Only	Geographic information used by Transportation Department.
Lumo	District Provided	Both	Lumo allows for engaging and interactive lessons to be deployed to students within existing Google Slides, Microsoft PowerPoint, and PDFs. Lessons can also be created using one of the 50+ activity templates.
Maclean eBooks	District Provided	Both	Our ebookstore eBook licenses, offered by a select group of publishers, are designated for classroom use. Purchase multiple copies of an eBook for a shorter license term at an affordable price.
MacleanVIA	School Available	Both	MacleanVIA is a digital content management system that provides access to eBooks, audiobooks, databases, and other digital resources through a single login.
MacleanVision	School Available	Staff Only	Maclean provides a wide range of K-12 educational materials, including print and digital titles, with services like shelf-ready processing and free shipping. They also offer the MacleanVIA digital content management system.
MacleanJuno	School Available	Both	MacleanJuno provides a suite of technologies for music education and creation, supporting musicians at all levels.
ManageXR	District Provided	Staff Only	The management platform for VR and AR devices.
Manufacturing Skills Standards Council	School Available	Both	Hands-on training and assessment used in CTE pathways.
Map Reading Fluency Testing	District Provided	Both	Get precise, reliable insights to support early readers while maximizing valuable instructional time. With speech-recognition technology, group administration, and automatic scoring, MAP Reading Fluency provides a clear view of early literacy skills and learning needs for an entire class in about 20 minutes.
Mastery Connect	School Available	Staff Only	Mastery Connect is an assessment management system designed to show learning in an intuitive, visual way by tying assessment data to actionable insights.
Mastery Connect Student	School Available	Students Only	MC Student allows students to take assignments, tests, quizzes, and common formative assessments using an iPad, iPad, or iPhone.
Mastery Item Bank (formerly CASE)	School Available	Staff Only	The Mastery Item Bank is a collection of flexible, standards-based items designed for district or classroom use, so educators can quickly create new assessments from expertly-developed items.
Mastery View Predictive Assessments (formerly CASE)	School Available	Both	Mastery View Predictive Assessments are rigorous, predictive assessments that measure academic progress, giving educators valuable and timely data to guide instruction, design effective interventions, and personalize learning.
MathBox	School Available	Both	Viewing state integration software.
MATH 180	School Available	Both	Math 180 is a digital math intervention program designed to build foundational skills and close math gaps for middle school students who are two or more years behind.
Math Nation	School Available	Staff Only	Math Nation provides online and print resources for middle and high school mathematics, including instructional videos, workbooks, and assessments.
MATLAB	School Available	Both	Programming and numeric computing platform for CTE pathways.
MBA Research	School Available	Both	An interactive digital learning management system for teaching business administration.
McGraw Hill eBooks	School Available	Both	McGraw Hill eBooks provide digital versions of their traditional print textbooks. These eBooks are designed to offer convenient and accessible learning materials.
McKinney-Vento	School Available	Staff Only	The McKinney-Vento Homeless Assistance Act authorizes the federal Education for Homeless Children and Youth (EHCY) Program.
MedNote AI	School Available	Both	Allows students to explore body systems and major organs virtually.
Mentimeter	District Provided	Staff Only	Live and instant polling, quizzes, and more for your presentations.
Mertyn Mind	School Available	Both	Mertyn Mind is an education technology company that focuses on developing AI-powered solutions for classrooms.
Metro United Way	School Available	Staff Only	Metro United Way serves seven counties in Kentucky and Indiana, focusing on thriving kids, strong households, and an equitable community through partnerships and community engagement.
Mews Multicam	School Available	Both	Mews Multicam is an app that allows content creators to seamlessly switch between multiple Mews cameras for live streaming and recording in 1080p HD.
MHS Multi-Health Systems	School Available	Staff Only	MHS provides tools that help professionals gain valuable insights into individuals, enabling them to make informed decisions in various contexts using products such as the Common Rule of ADHD assessments, the Level of Service scale of assessments, and the Emotional Quotient Inventory.
Microsoft 365	District Provided	Both	Microsoft 365 provides productivity apps, such as Microsoft Teams, Word, Excel, PowerPoint, Outlook, and OneDrive.
Microsoft Edge Web Browser	District Provided	Both	Microsoft browser for Windows 11.
MidSchoolMath	School Available	Both	MidSchoolMath develops comprehensive curriculum for Grades 5-8 and hosts an innovative National Conference dedicated to fixing middle school's greatest problem, and to build students' confidence.
MidSchool Education	District Provided	Both	MidSchool Education provides educators with tools and lesson plans to integrate curriculum into interactive, virtual worlds. It focuses on developing essential skills like problem-solving, creativity, and collaboration across various subjects, making learning more immersive and effective. MidSchool Education immerses students in interactive virtual worlds where they actively learn by building, exploring, and collaborating, making education feel less like traditional lessons and more like an adventure.
Mind	School Available	Staff Only	Mind provides unified communications, collaboration, and customer experience technology to support organizational communication and remote work.
MindTap	School Available	Both	Personalized learning environments for students enrolled in dual credit courses.
MindTap	School Available	Both	Personalized learning platform for students enrolled in dual credit courses.
MindTap	School Available	Both	Case Management Software used by Adult Education Department.

Product	District/school	Who Uses Product	Description
my!perspectives English Language Arts	School Available	Both	my!perspectives is a powerful English language arts curriculum for Grades 6-12 that values the perspective of the learner, collectively and individually, and provides rich/engaging learning experiences that promote higher achievement and develop the competencies needed for college and career readiness.
MySchoolBuddy	School Available	Staff Only	MySchoolBuddy is a service that facilitates online payments for various school-related expenses.
Mystery Science	School Available	Staff Only	A complete science curriculum for 3rd, 4th, and 5th grade. Hands-on — read students in the story of science and engineering.
National Association for Legal Support Professionals	School Available	Both	Tools, resources, and support for legal support career pathway.
National Center for Construction Education	School Available	Both	Training and credential for the construction industry.
National Geographic Virtual Library: National Geographic Kids	School Available	Both	National Geographic Kids provides age-appropriate digital content on science, nature, culture, and more, including magazines, books, videos, and images, for elementary and middle school students.
National Healthcare Association	School Available	Both	Tools, resources, and support for healthcare career pathway.
National Institute for Meatpacking Skills	School Available	Both	Tools, resources, and support for career pathways.
National Restaurant Association	School Available	Both	Provides current information on trends and issues within the restaurant and foodservice industry.
National Student Clearinghouse	School Available	Staff Only	The Clearinghouse serves as a trained agent to our participating institutions, which have approached us through the years to expand our services to help them meet their growing compliance, administrative, student access, accountability, and analytical needs.
NewsPod	School Available	Both	NewsPod is a platform that facilitates interactive, standards-aligned lessons, allowing teachers to create or customize content and engage students through various learning methods.
NewsPod Math	School Available	Both	NewsPod is a platform that facilitates interactive, standards-aligned lessons, allowing teachers to create or customize content and engage students through various learning methods. This is their math standards aligned curriculum.
Neptune Gametime	School Available	Staff Only	Neptune Gametime provides a database of family-friendly music for sports events, eliminating the need for manual screening.
New Readers Press	School Available	Both	Adult literacy program.
Newsela	School Available	Both	Newsela publishes daily nonfiction news articles at five reading levels on high-interest topics for students in grades 3-12. Using Newsela, teachers can engage all their students, both the active and reluctant readers, in thoughtful conversations about complex issues and current events.
Next Step Guided Reading Assessment K-6	School Available	Both	Next Step Guided Reading Assessment, based on Jan Richardson's Assess-Choose-Guide system, provides tools to determine student reading levels and guide instruction through various assessment methods.
NNAT3 or Ntangent Nonverbal	School Available	Both	NNAT3 is a general ability test with updated content, normative data, and online administration options, designed for use by education professionals.
NOCTI ~	School Available	Both	NOCTI provides validated technical skill assessments for secondary and postsecondary students, teacher candidates, and industry professionals, supporting accountability and instructional improvement.
Notefindr (No Red Ink)	School Available	Both	Notefindr is an online, web-based writing education platform designed to improve students' grammar and writing skills.
NRG VR	School Available	Both	Virtual reality.
+Topology	School Available	Both	Manufacturing design software.
Nucleus Smart App	School Available	Both	App for hearing-impaired students (SCE).
Nursing Arms	School Available	Both	Tools, resources, and support for career pathways.
Nutrilite	District Provided	Staff Only	Used by nutrition services department.
NWEA Map Growth	District Provided	Staff Only	Assessment tool for measuring achievement and growth in K-12 math, reading, language usage, and science.
O'Reilly Online Learning and Training	District Provided	Staff Only	O'Reilly Learning provides experienced and curated content, including books, videos, and live training, for individuals, teams, and enterprises to develop skills in technology, business, and more.
Once	School Available	Both	Once helps students learn to read fluently by combining the research-based Science of Reading, the structured design of our literacy sequence, and the power of individual attention and pacing.
Onshape	School Available	Both	Onshape is a full mechanical CAD platform designed for professional users and extended teams. Create, edit, collaborate, and comment in real time with others from any computer or mobile device with an internet connection.
Open Up Resources	District Provided	Staff Only	Open Up Resources provides free, high-quality curricula for K-12, developed in partnership with experts, available in print and digital formats.
OpenClea			
OpenSciEd	School Available	Staff Only	Science course materials.
Overdrive	School Available	Both	OverDrive provides digital content distribution and reading platforms, offering eBooks, audiobooks, and other digital resources to libraries and schools worldwide. It also includes services like Kanopy, teachingbooks, and the Libby and Sora apps.
Orbital	School Available	Both	Color-based coding language app.
PaperCut	School Available	Staff Only	Print management software that's helping hundreds of millions of people around the globe to minimize waste while having a secure and easy printing experience.
Parallel Learning	School Available	Both	Parallel Learning provides assessment and support services for students with learning differences, connecting schools and providers to create a comprehensive support ecosystem.
Pathful	School Available	Both	Pathful provides a comprehensive college and career readiness journey, connecting students with the world of work through asynchronous and live learning experiences.
Pathful Connect	School Available	Both	Pathful provides a comprehensive college and career readiness journey, connecting students with the world of work through asynchronous and live learning experiences.
Pathful Junior	School Available	Both	Pathful Junior is an interactive, digital learning platform designed to position K-5 students for success in the 21st century world. Its career exploration lessons cultivate students' interest in a variety of professions while strengthening their digital literacy skills and reinforcing their academic coursework.
Pathful Planner	School Available	Both	Pathful Planner empowers educators and students to create 4-6 year plans of study that align to each student's long-term goals.
Paymentbooks	School Available	Staff Only	Digital Supplier Onboarding for Secure, Compliant and Optimized Business Payments
PayScale	School Available	Staff Only	PayScale provides compensation data and software to help employers and employees understand market pay rates.
PBIS Rewards	School Available	Staff Only	PBIS Rewards is a Software-as-a-Service solution that provides an automated schoolwide PBIS management system. Our system simplifies the implementation and tracking of the PBIS framework within a school.
Pear Deck	School Available	Both	An interactive presentation software that engages students and is simple to use. Students and teachers participate in answering questions in real time. Formative assessment, 6 different tags.
PebbleGo	District Provided	Both	PebbleGo is an accessible database supporting K-2 student research, inquiry-based learning, and information literacy. Usage data by school and content area identifies popular topics, guiding resource alignment with curriculum needs and student interests.
PheedLoop Go!	School Available	Staff Only	Event management app.
Picture Book Database		Both	Teachers and librarians use this data to identify popular titles, inform lesson plans, thematic units, and read-aloud activities, ensuring the collection remains valuable for literacy instruction and student engagement.
PLTW Biomedical Science	School Available	Both	Project Lead the Way curriculum for CTE courses in JGPS.
PLTW Computer Science	School Available	Both	Project Lead the Way curriculum for CTE courses in JGPS.
PLTW Engineering	School Available	Both	Project Lead the Way curriculum for CTE courses in JGPS.
PLTW Gateway	School Available	Both	Project Lead the Way curriculum for Explore Courses in JGPS, 6-8.
PLTW Launch	School Available	Both	Project Lead the Way curriculum for students K-5.
PowerCMS	School Available	Staff Only	PowerCMS is a software platform designed for public safety agencies, offering tools for policy management, training, scheduling, and community engagement.
PowerSchool Unified Home	School Available	Staff Only	PowerSchool's communication products facilitate family engagement and improve school-home communication through online tools and real-time data insights.
Predictive Index Software	District Provided	Staff Only	Predictive Index Software is a talent optimization platform that uses scientific methods to help organizations build high-performing teams by understanding roles and personalities.
Prêt On My Way	School Available	Both	Prêt On My Way is a full-year curriculum that uses books and play to engage children and foster a love of learning.
Presence	School Available	Both	Presence Learning provides live online special education services, including therapy and assessments, delivered by licensed clinicians to K-12 schools.

Product	District/School	Who Uses Product	Description
PressView	School Available	Both	PressView Production tools are designed to streamline print workflow management for businesses of all sizes, supporting digital, offset, and wide-format printing.
Prodigies Academy	School Available	Both	Prodigies Academy provides a customizable, standards-based K-6 general music curriculum with interactive videos, activities, assessments, and LMS integration.
QuaverMusic	School Available	Both	QuaverMusic, Inc. provides interactive educational resources and software, aiming to enrich children's lives through comprehensive curriculum materials.
QuaverReady	School Available	Both	QuaverReady is an online platform providing social and emotional learning curriculum and behavioral resources for whole-school support.
Que Chavero	School Available	Both	Watch your students connect to the Spanish-speaking world, and rapidly develop language proficiency as well as cultural understanding.
Quizizz	School Available	Both	Quizizz is a platform for creating and using gamified quizzes and interactive lessons to engage learners.
Quizletivity	School Available	Both	Quizletivity is the client to secure authentication and MFA for all students and staff.
Raz-Kids	School Available	Both	Raz-Kids is an award-winning resource that provides a library of differentiated books and corresponding eQuizzes at 20 levels of difficulty for grades pre-K-6.
Raz-Plus	School Available	Both	Raz-Plus delivers a personalized learning approach to literacy that blends teacher-led whole-class and small-group instruction with technology-enabled resources that are printable, projectable, and digital for grades pre-K-6.
Raz-Plus: ELL Edition	School Available	Both	ELL Edition is a supplement to Raz-Plus.
RDA Toolkit	District Provided	Both Only	RDA Toolkit provides guidelines and instructions for creating library and cultural heritage metadata aligned with international standards for user-centered linked data.
READ 180	School Available	Both	READ 180 is a blended learning program that provides personalized reading instruction through a flexible model combining traditional and online learning.
Read Along by Google: A fun reading app	School Available	Both	Read Along is a free Android app that helps children learn to read through voice interaction and a virtual reading buddy.
Reading Academy	School Available	Both	Waterford Reading Academy provides an adaptive learning path for third-grade reading instruction, combining explicit teaching with engaging activities.
Reading Eggs	School Available	Both	Designed by literacy experts, Reading Eggs makes learning essential reading and phonics skills easy, fun, and highly effective. The program uses a motivating sequence of online reading lessons, activities and books that keep students engaged, on task, and making real progress.
ReadCare Baby & Control Center	School Available	Both	ReadCare Baby 3 is an infant simulator used in educational settings to teach parenting, infant care, and related subjects, with wireless tracking of caregiver actions.
Recruiting & Hiring	District Provided	Both Only	Workplace recruitment software part of Frontline for Education.
Relay	District Provided	Both Only	Lightsped internet filtering, formerly named Relay.
Renaissance - Star Reading	School Available	Both	A comprehensive reading assessment suitable for various instructional settings, designed for screening, monitoring, and goal setting.
Renaissance Accelerated Reader	School Available	Both	Accelerated Reader is a platform that motivates and monitors independent reading practice, offering personalized goals, quizzes, and progress reports.
Renaissance Learning	School Available	Both	Renaissance Learning is an online system that personalizes learning for third-grade students, using student profiles to match them with engaging enrichment activities and promote project-based learning.
RingCentral	School Available	Both Only	RingCentral is the JCPS cloud phone and hard phone provider for JCPS.
Rise Vision	School Available	Both Only	Digital Storage solution for school communications.
Riverside Insights	School Available	Both	Riverside Insights assessments are used to identify student strengths and areas for improvement, inform instruction, and support special education and gifted programs. Tools like the Cognitive Abilities Test (CogAT) help educators tailor their teaching strategies to meet the diverse needs of their students.
RTI Scheduler	School Available	Both Only	RTI Scheduler is built to address the logistics of providing flexible student schedules for targeted intervention and enrichment.
SAM Studio	School Available	Both	SAM Studio is used to enhance STEAM education by integrating coding into the curriculum. Students use the platform to develop critical thinking and problem-solving skills through interactive coding projects, while teachers utilize its resources to create engaging and meaningful lessons.
Savvas Vehicle Telematics	District Provided	Both Only	used in K-12 for transportation management, optimizing bus routes, and ensuring student safety during transportation.
SAT 10 - Stanford Achievement Test, Tenth Edition	District Provided	Both	A standardized achievement test used in K-12 to measure students' academic progress in core subjects, informing instructional decisions.
Savvas EasyBridge	School Available	Both Only	A learning management system (LMS) designed for K-12, providing digital curriculum, tools for teachers, and resources for students to enhance learning.
Scholastic BookFlix	School Available	Both	A tool or service used in K-12 to manage and organize classroom libraries or book collections, promoting literacy and access to reading materials.
Scholastic Digital Manager	School Available	Both Only	A platform that allows K-12 educators to manage and access Scholastic's digital resources, curriculum, and student data.
Scholastic FIRST: An Adventure on Oola Island	School Available	Both	An interactive digital learning game focused on early literacy skills for K-12 students, particularly in early elementary grades.
Scholastic GO!	School Available	Both	A digital encyclopedia and resource database designed for K-12 students, providing access to articles, videos, and other educational content for research and learning.
Scholastic Guided Reading Short Read Digital	School Available	Both	A digital resource providing short reading passages and activities for K-12 guided reading instruction, supporting literacy development.
Scholastic Literacy Pro	School Available	Both	A comprehensive reading assessment and management tool used in K-12 to monitor student progress and personalize reading instruction.
Scholastic Rise	School Available	Both	A K-12 program or tool that supports social-emotional learning (SEL) and helps students develop resilience, fostering positive classroom environments.
Scholastic ScienceFlix	School Available	Both	This digital resource provides engaging science content through videos, articles, and interactive features, designed to enhance science learning for students.
Scholastic Teachables	School Available	Both	This platform offers a vast library of printable and digital resources, including lesson plans, worksheets, and activities, for teachers to use in their classrooms.
Scholastic Teacher Dashboard	School Available	Both Only	This tool helps teachers manage their Scholastic digital resources, track student progress, and access relevant data to inform their instruction.
Scholastic TuxTrio	School Available	Both	This online resource combines animated storybooks with related nonfiction eBooks, fostering literacy and critical thinking skills in young learners.
Scholastic WORD	School Available	Both	This vocabulary program focuses on building students' word knowledge through engaging activities and games, improving their reading comprehension and communication skills.
Scholastic Writing Voices Library	School Available	Both	This collection provides diverse and authentic student writing samples, serving as models and inspiration for young writers, and promoting inclusive representation in the classroom.
Scholastic's Classroom Magazines	School Available	Both	Educational magazines published by Scholastic, designed to engage K-12 students in reading and learning across various subjects.
School Health Management	School Available	Both	Used to streamline and manage health-related data and processes within a school setting. This includes things like student medical records, immunization tracking, medication administration, and reporting.
School Messenger Chat	District Provided	Both	This is a communication platform designed for schools to facilitate instant messaging and real-time communication between teachers, parents, students, and staff. It often integrates with other School Messenger communication tools.
SchoolCare	School Available	Both Only	Software that helps schools manage student health records, track medical incidents, and streamline health office operations. It often integrates with other School Messenger communication tools.
SchoolMessenger Communicate	District Provided	Both Only	SchoolMessenger solutions, you can combine school notification, mobile apps, and web content management all under one, easy-to-use platform.
SchoolMint Enroll	District Provided	Both Only	SchoolMint Enroll is an online enrollment system for K-12 districts offering tools for application management, lottery and placement, and student registration.
Science A-Z	School Available	Both	This is an online resource that provides comprehensive science curriculum for grades K-6. It blends science and literacy instruction with a wide range of materials, including leveled readers, hands-on activities, and experiments, designed to engage students and develop their scientific literacy.
Screenicity	District Provided	Both	Screenicity recording tool that can be used by teachers to create on-demand videos that support asynchronous learning. Students can use the submit feature to submit assigned work to their teacher.
Seems List of Subject Headings	District Provided	Both Only	SEASIS On uses logs, unique searches, and successful searches to assess how effectively this resource enhances subject headings in MARC records, improving students' ability to locate books by subject in their library OPACs.
GUIMI	School Available	Both	GUIMI is an adaptive online learning platform that focuses on building foundational math skills. It uses personalized learning paths to address individual student needs and provide targeted practice.
Skydio 2+	School Available	Both	The Skydio 2+ is an autonomous drone that utilizes advanced AI and computer vision. While used in various industries, it can also be used in educational settings to provide unique perspectives for learning, particularly in fields like geography, environmental science, and engineering.
SMART Learning Suite	District Provided	Both	This is a suite of educational software that includes interactive lesson delivery, collaborative learning tools, and formative assessment features. It's designed to enhance classroom engagement and facilitate dynamic teaching and learning.
StepType	School Available	Both	StepType is an app that allows users to complete worksheets on iOS devices by adding text to imported or photographed documents.
Some Spanish Curriculum	School Available	Both	This curriculum utilizes comprehension-based methods to teach Spanish language and culture simultaneously, promoting proficiency and cultural understanding.
Sphero EDU	School Available	Both	This platform uses programmable robots (Sphero robots) to teach students coding, STEM principles, and creative problem-solving through hands-on activities and interactive lessons.

Product	District/School	Who Uses Product	Description
Splash Math (Learn)	School Available	Both	Game-based learning program that provides personalized math practice for students in grades K-5. It uses engaging activities and adaptive technology to reinforce math concepts.
Stone School Edition	School Available	Both	This is a digital library and reading platform from Scholastic, offering a wide selection of e-books and interactive reading experiences for students. (Note: Scholastic has since shifted the digital reading focus, and Stone is less emphasized now.)
Student Data Privacy Consortium	Parents Provided	Staff Only	The SDPC is a collaborative that develops practical solutions to student data privacy concerns for schools, districts, and other educational organizations.
Student Success	School Available	Staff Only	Used to strengthen MTSS/RTI and PBIS with dashboards featuring unified academic, behavior, and SEL data for each student to streamline interventions.
Study Island	School Available	Both	Study Island is an online program that provides standards-based practice and assessment tools for students in grades K-12. It helps students prepare for standardized tests and reinforce classroom learning.
System 44	School Available	Both	System 44 is a program designed to help students master foundational reading skills through explicit and adaptive instruction in comprehension and writing.
Twa Branch	School Available	Both	This is a French language learning program that provides instruction and resources for students learning French.
Tableau	School Available	Both	Tableau is a data visualization and analytics platform that allows users to create interactive charts, graphs, and dashboards.
Teach to One Roadmaps	Both	Both	TeachingRoadmaps is a website that provides multimedia resources for K-12 books, enhancing reading experiences and integrating author and book materials into learning activities.
Teaching Books	Parents Provided	Both	TeachingBooks is a resource database offering summaries, lesson plans, activities, and award information for books in JCPS schools and libraries. It includes diversity audit tools that help LMS analyze school library collections.
TestPrep	Parents Provided	Both	TestPrep provides interactive testing to students who learn and play in a digital environment.
TestOut	School Available	Students Only	TestOut provides IT certification training courses.
TestOut Network Pro	School Available	Students Only	This is a specific certification and course within the TestOut platform. It focuses on networking skills, covering topics like network hardware, configuration, management, security, and troubleshooting. It prepares individuals for careers in network administration and related field.
The DBQ Project	School Available	Both	The DBQ Project focuses on teaching students how to analyze and interpret historical documents to construct well-supported written arguments. It emphasizes critical thinking, reading comprehension, and writing skills, particularly in social studies education.
The Impact Suite: For AmeriCorps Programs	School Available	Both	Teach to One Roadmaps provides personalized math learning through individualized student roadmaps, assessments, and teacher tools to address learning loss and accelerate progress.
The Planning Binder	School Available	Staff Only	The Planning Binder is a subscription library providing long-range curricular planning documents and music curriculum training for music educators.
ThinkCERCA	School Available	Both	Provides a literacy platform designed to help students develop critical thinking skills through argumentative writing.
To-Teach	Parents Provided	Staff Only	To-Teach Suite is an Adobe Acrobat add-on that allows tax and accounting offices to create annotated workpapers directly from PDF documents.
Title I Next	Parents Provided	Staff Only	Title I Next™ provides documentation management and supports district-wide compliance monitoring for all Title I, Federal Programs, and Central Office Administrative Departments. It ensures central office administrators can quickly disseminate, review, evaluate, and approve an unlimited number of compliance documents from schools and principals.
Traverse	Parents Provided	Staff Only	Traverse manages bus routing, track student identity, and communicate with parents and students about transportation information.
TrustEd Apple Management Suite	Parents Provided	Staff Only	The iEdTech TrustEd Apple Program supports the development of open, trusted, and innovative digital learning acceptance through pledges, vetting, management tools, and a leadership program.
Typew	School Available	Both	Typew is a typing tutor software program.
Unique Learning System	School Available	Both	Standard-based curriculum designed specifically for students with complex learning needs. It provides differentiated instruction and accessible materials to support students with cognitive disabilities.
Vector Solutions	Parents Provided	Staff Only	Used for managing training, tracking certifications, and ensuring that educational institutions meet regulatory requirements.
VenereWare FleetScan	Parents Provided	Staff Only	FleetScan is a software solution that automates and simplifies fleet maintenance management, including preventative scheduling, inventory tracking, and work order management.
VEXcode	School Available	Students Only	This is a coding environment designed for use with VEX Robotics platforms. It provides a user-friendly interface for students to learn coding concepts and program their robots.
Visual Studio Code	School Available	Both	Open-source code editor used by developers for various programming languages and offers extensive customization and extensions.
Visual Studio Professional	Parents Provided	Staff Only	This is a commercial integrated development environment (IDE) from Microsoft. It provides a comprehensive set of tools for software development, including debugging, testing, and deployment features.
Vocabulary A-Z	School Available	Both	Online resource that provides vocabulary instruction and practice for students. It includes a variety of activities and resources to help students expand their word knowledge.
Watch & Learn Library	School Available	Both	A New Video Library for Early Learners. Watch Knowledge Grow with Real-World Videos, Grades Pre-K to 3, in English and Spanish.
Web Dweezy	Parents Provided	Staff Only	WebDweezy is the electronic Dewey Decimal Classification (DDC) tool used by LMS to generate accurate call numbers, ensuring consistent and organized library collections.
Wendler Edge	School Available	Staff Only	Online legal research platform.
Wonders Words Plus	School Available	Both	Provides digital adaptations of children's literature, often in animated video form. It is designed to engage young readers with classic stories.
WorVideo	School Available	Both	Video editing platform that allows users to create and edit videos online.
WorVista	School Available	Staff Only	Provides solutions for financial reporting, compliance, and risk management.
Writing A-Z	School Available	Both	Online resource that provides writing instruction and practice for students. It includes a variety of writing prompts, graphic organizers, and other tools to help students develop their writing skills.
YouTube	Parents Provided	Both	YouTube is used as a powerful educational tool to support both teaching and learning. Teachers create and share instructional videos, tutorials, and lesson highlights, while students access a wide range of educational content to supplement their studies. The JCPS Digital Learning Channel offers resources and live support for education, fostering a collaborative and innovative learning environment.
Zonar Systems	Parents Provided	Staff Only	Provides electronic fleet management solutions. Their services include vehicle tracking, route optimization, driver productivity tools, and compliance solutions.
Zeich Global Foundation	School Available	Staff Only	Zeich Global Foundation provides evidence-based health education and Whole Child wellness programs for schools and communities.
CB Bridges	School Available	Both	CB Bridges™ is an online platform that standardizes and facilitates collaboration between clinical partners, streamlining the clinical experience process.
Celebrity Insights	Parents Provided	Staff Only	Insights is a digital forensics suite that provides tools for access, extraction, decoding, review, management, automation, and triage of digital evidence.
Certipoint	School Available	Both	Certipoint prepares individuals with current and relevant digital skills and credentials for the competitive global workforce.
Certipoint ACU	School Available	Both	Certipoint prepares individuals with current and relevant digital skills and credentials for the competitive global workforce. - Autodesk Certified User
Challenger Center	School Available	Both	Challenger Center is a STEM education nonprofit that develops and delivers simulation-based programs to inspire students through hands-on learning.
Chrome Remote Desktop	School Available	Staff Only	Chrome Remote Desktop allows users to remotely access another computer through Chrome browser or a Chromebook.
CIBS Workspace	School Available	Both	Virtual Desktop software for students and staff to use in CTE courses.
CleavVR	School Available	Staff Only	CleavVR is the world's first complete virtual and augmented reality set designed specifically for schools, with standalone headsets, intuitive gesture controls, a huge library of content and an extensive teacher management portal.
CLEAR	Parents Provided	Staff Only	Thomson Reuters CLEAR® is a data aggregation platform that uses public records technology to provide comprehensive information on people and businesses.
Code.org	School Available	Both	Code.org is a curriculum resource for Computer Science teachers with a built in IDE for students to use.
College Board - AP Classroom Login	School Available	Both	The free, flexible online instructional resources available in AP Classroom support AP teachers and students to make what their learning environment.
Connect Forte	School Available	Staff Only	Connect Forte is a form management platform that helps users organize, search, license, and share forms, with features like font pairing recommendations and SSO.
Cough Drop	School Available	Both	CoughDrop provides Augmentative and Alternative Communication (AAC) software to help individuals with complex communication needs express themselves.
CritiQ Design Space	School Available	Both	CritiQ Design Space is a software application that allows users to browse images, fonts, and projects, or design their own for use with CritiQ cutting machines.
Cummins QubitSense online	Parents Provided	Staff Only	Software for parts and service information for engine wear numbers.
Cyren Alliance T	Parents Provided	Staff Only	Cyren provides software solutions for public safety agencies to control, analyze, and report on data, improving efficiency and accountability.
Decorum Follow	School Available	Both	The Decorum Follow App allows users to remotely monitor the glucose levels, trends, and data of loved ones who are using a Decorum CGM system.
Diagnostic Link	Parents Provided	Staff Only	This tool displays ECU information, diagnostic fault codes, instrumentation, and runs service routines. - Used by JCPS Transportation Services

Product	District/School	Who Uses Product	Description
Deliquis AAC	School Available	Both	Deliquis AAC is a communication solution for adults with speech difficulties, featuring a customizable spelling and phrase-based vocabulary, voice banking, and accessibility options.
DIRT	School Available	Both	DIRT allows teachers to adapt existing materials for different reading levels and generate informational or narrative texts on any topic.
dig Coach	School Available	Staff Only	digCOACH is a walkthrough tool that helps educators collect data, coach teachers, and track trends to improve instruction and student outcomes.
Drone Blocks	School Available	Both	DroneBlocks teaches STEM and the real-world application of drones, robots, and sensor technology through our apps, drone coding curriculum, simulator, and professional development.
Educators Rising	School Available	Both	Educators Rising cultivates a new generation of skilled educators by guiding students from high school through college and into teaching careers.
Edulog - Address Routing	School Available	Both	EDULOG provides school bus routing, planning, GPS tracking, and web solutions to improve student transportation efficiency and safety.
Engineering for US AI	School Available	Both	Engineering for US AI (e4usai) is a national initiative designed to introduce engineering design principles to students.
Entry Level Certification Program	School Available	Both	ASE Entry-Level certification tests are available for the Automobile, Collision Repair/Refinish and MHI Truck segments (series).
EPIC System	School Available	Staff Only	EPIC System (Education Paging & Intercom Communications) gives access to all of the top of the line functions needed every day to efficiently operate a modern K-12 campus.
E-Signatures powered by Adobe Sign	School Available	Staff Only	E-Signature software for Adobe Products.
ESM Source	School Available	Staff Only	ESM Source offers tools for efficient sourcing, improved collaboration with suppliers, and better management of costs and supplier diversity.
PlayVS	School Available	Both	High school esports.
Plunlight	School Available	Staff Only	Technical training for central office staff.
Proctort	School Available	Students Only	Proctored assessments.
Project School Wellness	School Available	Both	Health education.
ProQuest: CultureGames	School Available	Both	Online reference material.
ProWrite	School Available	Both	A 3D printing slicing software, it prepares 3D models for printing by generating toolpaths and optimizing settings for Prusa 3D printers.
Ready Set Math	School Available	Both	An educational software program designed to help students improve their math skills through interactive exercises and practice problems.
Responsive Lock/Down Browser	School Available	Both	A custom browser that locks down the testing environment during online exams, preventing students from accessing unauthorized websites or applications.
SecureTime	School Available	Staff Only	A time and attendance tracking software, used to manage employee work hours, schedules, and payroll.
Qualtrics	School Available	Staff Only	A powerful survey and experience management platform, it enables users to collect and analyze data for research, customer feedback, and market analysis.
SimPed PLUS	School Available	Both	A simulation control device used in medical training, allowing instructors to control and monitor patient simulations.
SnapIt	School Available	Both	A screen capture and recording tool, enabling users to capture images and videos of their computer screen for creating tutorials and documentation.
SNO Sites	School Available	Both	A platform that provides website building and hosting services specifically designed for student news organizations.
SPARK Physical Education	School Available	Staff Only	Provides curriculum and resources for physical education programs, promoting active lifestyles and fitness.
SpecialEdSimplified	School Available	Both	A software solution designed to streamline the management of special education processes, including IEP development and compliance.
Sphere: Both	School Available	Both	A programmable robotic ball used in education to teach coding and STEM concepts through hands-on activities.
Spreadsheet Scanner	School Available	Both	Integrates with ERP systems, allowing users to extract and analyze data directly within Microsoft Excel.
STEP CG	School Available	Both	Provides technology solutions and services, including cloud, data center, and cybersecurity, for businesses and organizations.
Student High School AI-access Pass	School Available	Staff Only	This platform provides digital marketing and business simulations and curriculum for high school students.
SurveyMonkey	School Available	Both	An online survey tool that allows users to create and distribute surveys for data collection and analysis.
Tactical Aviation	School Available	Both	Provides flight simulation software and training solutions for pilots and aviation professionals.
TalentoSmartIQ Assessments	School Available	Both	A flowchart program delivered through digital platforms, offering online worksheets and training sessions.
TD CoPilot (Tobi Dynamics)	School Available	Both	Provides tools for measuring and developing emotional intelligence (EQ) in individuals and teams.
TD Snap	School Available	Both	A software that provides environmental control and computer access for individuals with communication and physical disabilities.
TD Snap AAC	School Available	Both	An augmentative and alternative communication (AAC) software that provides symbol-based communication for people with speech impairments.
TD Snap	School Available	Both	Same as the previous answer.
TD Talk	School Available	Both	An AAC software that provides text-to-speech communication for individuals who have trouble speaking.
ThinkLex Curriculum	School Available	Both	Provides critical thinking and legal reasoning lessons for K-12 students, enhancing their analytical skills.
Think Smartbox, Grid 3	School Available	Both	An AAC software that allows individuals with disabilities to communicate and control their environment using symbols, text, and voice output.
Trivium	School Available	Both	A real-time 3D design and modeling tool, used for creating 3D models and electronic circuit designs.
Total ID Solutions - Badge System Software	School Available	Both	This software manages the creation and issuance of identification badges for organizations, enhancing security and access control.
UltimateSLP	School Available	Both	Provides digital resources and tools for speech-language pathologists, including therapy materials and assessment tools.
VMeasure	School Available	Both	Provides virtualization and cloud computing software, enabling businesses to run multiple operating systems and applications on a single server.
VidMeat	School Available	Both	A custom tool that allows users to collect and organize online content, such as articles, videos, and images, into visual collections.
Weather Portfolio	School Available	Both	A software application that provides real-time weather information and forecasts.
X-Plane 12	School Available	Both	A flight simulator software that provides a realistic and immersive flight experience for aviation enthusiasts and professionals.
xTool Creative Space	School Available	Both	A software program that allows users to design and control laser cutting and engraving machines.
Zoom	School Available	Both	A video conferencing platform that enables online meetings, webinars, and virtual collaboration.
AIHLI Certified Hospitality & Tourism Management Professional	School Available	Both	Certification program for hospitality and tourism management professionals from the American Hotel & Lodging Educational Institute.
American Fuel Power and Robotics	School Available	Both	Training and educational resources for fuel power and robotics from AmeriFuel.
American Heart Association - HeartSaver Courses	School Available	Both	Courses from the American Heart Association focusing on basic life support and first aid.
AMS SENSE Program	School Available	Both	Welding education program from the American Welding Society.
Aztec (Aztec's Bridge, Aztec's Foundations, Aztec's Fundamentals, GED Flash, Kaplan GED Prep)	School Available	Both	Educational software and resources for GED preparation and foundational skills from Aztec Software.
Baniko Studio	School Available	Both	3D printing software and platform from Baniko Lab.
Big Picture Learning IQ Platform	School Available	Both	Professional development platform for educators from Big Picture Learning.
Bimaji	School Available	Both	Personalized water creation and integration tool.
Bosout Sports Software	School Available	Both	Sports management and analysis software.
Burlington English	School Available	Both	English language learning software and resources from Burlington English.
Canvas LMS (College version)	School Available	Both	Learning Management System (LMS) used for online education in college settings.
CompTIA CertMaster (IT Fundamentals A+, Net+, Security+)	School Available	Both	Certification training and preparation resources for various CompTIA IT certifications.
ComputoSolar	School Available	Both	Computer science and digital arts curriculum and resources.
CUNA (Credit Union National Association) Certificate	School Available	Both	Certificate programs offered by the Credit Union National Association.
Dreambox Learning Math	School Available	Both	Adaptive math learning platform for students.
Edmentum - BASE Education	School Available	Both	Educational software and resources from Edmentum, specifically BASE Education.
Edmentum	School Available	Both	Educational assessment and intervention platform.

Product	District/School	Who Uses Product	Description
Edmentum Learning	School Available	Both	Online learning courses and resources from Edmentum Learning.
EPIC Games (Unreal Engine)	School Available	Both	Game development software and resources from Epic Games, specifically Unreal Engine.
ePrep (ICERT, Graduation Planner, QTA, TDM)	School Available	Both	Test preparation and educational planning resources from ePrep.
ESCO Institute - EPA Section 608 Industry Certification	School Available	Both	Certification program for technicians who handle refrigerants from ESCO Institute.
EvoFit	School Available	Both	Digital learning platform providing financial literacy, health, and career readiness education.
Hewlett Learning - College Algebra 3e Software + COL eBook	School Available	Both	College algebra software and eBook from Hewlett Learning.
IEClass.com	School Available	Both	Online learning platform and resources.
KYOTE	School Available	Both	KerbyOnline Testing platform for college readiness assessments.
MIT App Inventor	School Available	Both	Visual programming environment for creating Android apps.
MISC - Certified Production Technician (CPT)	School Available	Both	Certification program for production technicians from the Manufacturing Skill Standards Council.
National Retail Foundation - Rise Up	School Available	Both	Retail industry training and certification program from the National Retail Foundation.
NCCER ConnectPerson	School Available	Both	Construction and craft training resources from NCCER and Pearson.
NIMS - Machine Tool Certification (Level 1)	School Available	Both	Certification program for machine tool operators from the National Institute for Metalworking Skills.
Oracle Java Programmer/Junior Associate	School Available	Both	Java programming certification programs from Oracle.
Orion Scoring System	School Available	Both	Assessment and scoring platform.
Pearson VUE	School Available	Both	Test delivery platform for various certification exams.
Project Shery CS Python Fundamentals/CS Exploration	School Available	Both	Computer science education programs focusing on Python programming.
QuickBooks Online	School Available	Both	Online accounting software for small businesses.
Remedy Classroom (Foundations in Personal Finance)	School Available	Both	Personal finance curriculum and resources from Remedy Software.
RevelityWorks	School Available	Both	Educational products and simulations for career and technical education.
Redbird Jay Velocity Edition	School Available	Both	Online learning platform for math and reading.
Robotics Drones	School Available	Both	Drone technology and education resources.
Simbox	School Available	Both	Simulation software and training tools.
Smart Goals	School Available	Both	Collaborative work management platform.
Snap On Industrial	School Available	Both	Industrial tools and equipment training resources.
Solid Professor - Interactive Applications	School Available	Both	Online courses and tutorials for CAD software and engineering concepts.
Spot Robots Platform (Boston Dynamics)	School Available	Both	Advanced robotics platform from Boston Dynamics.
Unity	School Available	Both	Game development engine and platform.

APPENDIX G: JCPS'S RACIAL EQUITY POLICY

STUDENTS

09.131

District Racial Equity Policy

FINDINGS

The Board hereby finds and declares the following:

- The Board acknowledges persistent gaps in academic achievement, attendance, learning, expectations, opportunities and access, sense of belonging, and disciplinary outcomes among student groups based on race and ethnicity.
- The Board recognizes that Students of Color (i.e., students who have a racial identity other than White) have been disadvantaged by long-standing inequities in our society, the causes of which are multi-faceted, and reflect historical, social, and institutional factors.
- The Board believes that as a diverse urban school district whose student population is mostly Students of Color, the District must take a systemic approach to ensure that students have equitable learning opportunities, experiences, and outcomes.

DEFINITIONS

As used in the policy, “racial educational equity” means a systemic approach to eliminate inequities and improve education opportunities, experiences, and outcomes for all students, that validates and affirms race by examining those historical, social, and institutional factors present in education.

COMMITMENTS

In accordance with the Board’s findings, the Board commits to remedying these inequities and guaranteeing fair treatment and equitable access to a quality education for all students. The District must take these historical, social, and institutional factors into account in educating Students of Color, so the District can achieve and maintain racial educational equity for all students.

To achieve and maintain racial educational equity for all students, the Board commits the District to promoting the success of all students and work actively to eliminate institutional and structural policies and practices that perpetuate inequities among racial groups and thereby contribute to disproportionality of access and outcomes.

When implementing the provisions of this policy, the District shall comply with all applicable provisions of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; the Individuals with Disabilities Education Act of 1990; Section 504 of the Rehabilitation Act of 1973; and the Americans with Disabilities Act of 1990.

SYSTEM-WIDE RACIAL EDUCATIONAL EQUITY PLAN

The Superintendent shall prepare and submit to the Board for approval, a System-wide Racial Educational Equity Plan that contains strategies for achieving and maintaining racial educational equity for all students.

This racial educational equity plan shall align with the Policy Directives of this District Racial Equity Policy which shall:

1. Utilize research or evidence-based strategies and practices at the classroom, school, and District level;

District Racial Equity Policy**SYSTEM-WIDE RACIAL EDUCATIONAL EQUITY PLAN (CONTINUED)**

2. Establish clear goals and metrics for improvement and accountability through a data-driven process;
3. Be subject to review and renewal by the Superintendent, and approval by the Board, at least once every three (3) years;
4. Require each Central Office Division and Department to develop strategies to be included in the system-wide plan; and
5. Require each school to develop a school-based racial equity plan, including clear goals and metrics for improvement and accountability, in alignment with the Policy Directives of this District Racial Equity Policy.

School, Division, and Department strategies shall be aligned to the system-wide plan, and be developed based on school, Division, or Department-level data. A school's strategy (specific to literacy and numeracy) shall be incorporated into the school's Comprehensive School Improvement Plan (CSIP). Division and Department strategies shall be incorporated into the District's Comprehensive District Improvement Plan (CDIP).

Progress Monitoring Structure

- Progress monitoring meetings for the System-wide Racial Educational Equity Plan shall occur six (6) times during the course of the school year to visit racial equity work occurring at the Central Office and school level. These meetings shall occur with the Central Office Representative for the respective departments and school zones. During these meetings, divisions shall review their racial equity strategies as outlined in the JCPS Racial Educational Equity Plan and progress toward goals. The department representative shall speak to the work that is occurring as it relates to their identified strategies and progress with the inclusion of data centered on those goals and next steps. Leadership from the Schools Division shall highlight the progress being made toward attainment of school-identified racial equity goals.
- Each school shall be required to complete and submit to the Diversity, Equity, Poverty (DEP) Division their Equity Monitoring Progress Tool (EMPT) during the spring of each school year. A team from DEP shall review each school's EMPT and provide feedback. In turn, each school's Racial Equity Committee (REC) will develop their Racial Equity Plan (REP), including goals based on opportunities for growth and feedback. Goals shall include measurable student outcomes and will be submitted at the beginning of each school year. As a means to monitor progress, each school will report progress on their goals and action steps four (4) times during the course of the school year.
- Each school shall reference how school racial equity funds will be used to address the strategies within their school racial equity plan.

District Racial Equity Policy**SYSTEM-WIDE RACIAL EDUCATIONAL EQUITY PLAN (CONTINUED)****Students**

The system-wide plan shall include strategies to:

1. Raise the achievement of all students while minimizing the gaps among Students of Color and White students, balancing those efforts across intersectionality (including but not limited to race, gender, household income, special education status and linguistic diversity).
2. Eliminate or alter school and District procedures and practices that create systemic racial disparities in educational opportunities and outcomes, including, but not limited to, disciplinary practices, grading procedures, identification of students for special education/gifted services, and access to programs and courses for enhanced or accelerated learning.
3. Increase the diversity of school and District staff to more closely reflect the racial, ethnic, and linguistic make-up of the District's student population.
4. Improve the sense of belonging at all schools, the Central Office, and all District facilities such that all students, families, and staff feel welcome and respected. School, Division, Department, and building-level culture and climate data (e.g. Comprehensive School Survey, Impact Kentucky Working Conditions Survey, etc.) shall be used to develop the strategies.
5. Establish in all schools a culture of teaching and learning that maintains high expectations for all students and staff, promotes engagement in academic innovation, and provides personalized and systemic supports for students and teachers.
6. Provide teachers and other school-based personnel with ongoing technical, pedagogical, socio-emotional, and curriculum training and support throughout their careers, to improve school academic outcomes, sense of belonging, and to create an environment of respect and support among students, faculty, and staff.

POLICY DIRECTIVES

The system-wide plan shall be developed and implemented by the Superintendent to address the following policy directives:

1. Diversity in Curriculum, Instruction, and Assessment

The District shall:

- a) Identify, develop, utilize, and prioritize Districtwide implementation of evidence-based planning and instructional practices, such as those lifted in the Affirming Racial Equity (ARE) Tool, that have been shown to improve learning outcomes for Students of Color at all achievement levels in order to minimize the prevalent and persistent learning outcome gaps among Students of Color and White students.

District Racial Equity Policy**POLICY DIRECTIVES (CONTINUED)**

- b) Adopt high-quality instructional resources and develop professional learning for school staff in alignment with Kentucky Academic Standards to implement that more effectively and accurately include the contributions and historical relevance of African-American, Latinx, Asian-American, and other non-White cultures; the experiences of People of Color; and the history of immigration, indigenous peoples, and ethnic diasporas and their impact on U.S. history, culture, and society.

2. School Culture and Climate

The District shall:

- a) Provide ongoing mandatory professional development for all school and District staff that
 1. Creates a culture of high expectations for all students;
 2. Provides teachers with knowledge and tools to provide students with ongoing opportunities to understand racial identity and its impact;
 3. Helps identify and address racism (personal and structural), racial trauma, and implicit bias;
 4. Trains school and District staff to implement restorative practice strategies;
 5. Increases the cultural competence of school and District staff; and
 6. Equips and empowers school and District staff to eliminate racial and ethnic disparities in learning opportunities and to minimize the prevalent and persistent learning outcome gaps among Students of Color and White students.
- b) Employ strategies listed under paragraph a) of this subsection to reduce racial disproportionality in disciplinary actions.

3. Programmatic Access

The District shall:

- a) Increase enrollment and implement strategies to support the successful completion of enhanced or accelerated educational programs and courses by Students of Color, including, but not limited to, magnet and optional programs, programs for Gifted and Talented students, Advance Program, Advanced Placement, Dual Credit, International Baccalaureate, Cambridge International, internships, apprenticeships, career and technical programs, and enrichment and extended learning opportunities.
- b) Provide informational sessions in which students and families are educated on their options within these programs and evaluate outcomes as it relates to enrollment and completion; with data to be monitored via the system-wide racial educational equity plan.

4. Staffing and Classroom Diversity

District Racial Equity Policy

POLICY DIRECTIVES (CONTINUED)

The District shall:

- a) Attract, recruit, hire, and retain staff and leadership that more closely reflect the racial, ethnic, and linguistic diversity of the student body of the District.
- b) Incorporate as part of the application and hiring process for positions Grade 9 and above, the completion of an Equity Screener.
- c) Provide training to District and school administrators and school-based decision making councils to increase capacity for non-biased interview processes, as well as strategies for increasing staff racial diversity in an urban school district, where a majority of students are Students of Color.

5. Evaluating Board Policies and Administrative Procedures

The District shall:

- a) Conduct comprehensive reviews at least one (1) time every five (5) years of existing Board policies and administrative procedures, including but not limited to this policy, using the Racial Equity Analysis Protocol (REAP), and propose changes to policies and administrative procedures, as needed, to achieve and maintain racial educational equity.
- b) Utilize the REAP when developing recommendations for staffing, budget allocations, curriculum selection, evidence of learning (i.e. grading) protocols adopting alternative discipline practices, and contract procurement.

Schools shall:

- a) Conduct comprehensive reviews at least one (1) time every five (5) years of existing policies and procedures, using the REAP, and proposing changes to policies and procedures, as needed.
- b) Utilize the REAP in the development of new policies and procedures, to achieve and maintain racial educational equity.

ADVISORY COUNCIL FOR RACIAL EQUITY

The Superintendent shall establish an Advisory Council for Racial Equity (ACRE) with management and facilitation by the Diversity, Equity, and Poverty Division.. The advisory council will advise and provide feedback on challenges and issues with racial equity in the district based on the racial equity policy. In addition, the advisory council will provide technical support to schools and District leadership that includes, but is not limited to, the development of school and division and department racial equity improvement strategies.

ACRE shall reflect the racial, ethnic, and linguistic diversity of the student population of the district, and have a proven commitment to racial educational equity. The member selection process shall include the representative organization of members and shall be as follows:

- a) A teacher representative selected by the Jefferson County Teachers Association;

District Racial Equity Policy**ADVISORY COUNCIL FOR RACIAL EQUITY (CONTINUED)**

- b) An administrator representative selected by the Jefferson County Association of School Administrators;
- c) A non-administrative classified employee representative selected by the leaders of the associations that represent classified employees of the District;
- d) Two (2) parent representatives selected by ACRE from nominees submitted by the 15th District PTA or an independent PTO;
- e) Two (2) community representatives selected by the Superintendent.

The advisory council shall:

- a) Be comprised of individuals who have a commitment to racial educational equity;
- b) Include representation from several different geographic areas of the District;
- c) Include parent, teacher, classified staff member, administrator, and community member representation; and
- d) Reflect, insofar as practicable, the racial and ethnic composition of the student population of the District.

Vacancies shall be filled with the individuals selected by ACRE, in accordance with the parameters for membership set forth in this section.

ACCOUNTABILITY

- a) The Superintendent or designee shall meet at least bi-monthly with the Advisory Council for Racial Equity (ACRE) to receive status reports, concerns, and provide support.
- b) The Superintendent shall report at least two (2) times per year to the Board regarding the implementation of this policy at the classroom, school, and District levels, and progress on meeting the measurable goals established in the system-wide plan.
- c) The Superintendent or designee, in collaboration with ACRE, shall host community conversations two (2) times per year to hear from community members regarding issues relating to racial educational equity, and to provide status reports to community members regarding implementation of the System-wide Education Equity Plan.
- d) The Board shall monitor progress toward implementation of this policy and the reduction of gaps in achievement, learning, expectations, opportunities, and disciplinary outcomes, which are in alignment with the Student Outcome-Focused Governance Goals and Guardrails adopted by the Board. This shall be considered as part of the Superintendent's evaluation.

STUDENTS

09.131
(CONTINUED)

District Racial Equity Policy

RELATED POLICIES

- 01.111; 02.442; 03.133; 03.1912; 03.233
- 08.132; 08.141; 08.2; 08.51; 09.13; 09.42811
- IA; IB

Adopted/Amended: 10/14/2025
Order #: 2025-175

APPENDIX H: JCPS'S RACIAL EDUCATIONAL EQUITY PLAN 2025-2028

JCPS Racial Educational Equity Plan 2025-2028

Introduction

On May 8, 2018, the Jefferson County Board of Education approved Board Policy 09.131 – District Commitment to Racial Educational Equity. The policy requires the District to “prepare and submit to the Board for approval, a System-wide Racial Educational Equity Plan that contains strategies for achieving and maintaining racial educational equity for all students.” The District Racial Educational Equity Plan must be reviewed, amended, and renewed by the Board at least once every three years.

The plan was developed through a collaborative process led by the Chief Equity Officer. Each Division developed an initial draft Equity Plan to address the five Policy Directives established in Board Policy 09.131:

1. Diversity in Curriculum, Instruction, & Assessment
2. School Culture & Climate
3. Programmatic Access
4. Staffing & Classroom Diversity
5. Evaluating Board Policy and Administrative Procedures

The draft Division Equity Plans were then consolidated and aligned to create the single System-wide Racial Educational Equity Plan. The final plan incorporates valuable input from the Racial Equity Advisory Council established by Board Policy 09.131. A key role of the council is to “assist the Superintendent in the development and monitoring of the system-wide plan.” The council’s membership reflects the racial and ethnic composition of the student population of the District and includes parents, teachers, classified staff members, administrators, and community members, who have a proven commitment to racial educational equity.

The plan identifies action steps to be taken to improve racial educational equity across the District, and to reduce persistent gaps in achievement, learning, expectations, opportunities, and disciplinary outcomes among student groups based on race and ethnicity. The plan also establishes specific targets on measurable indicators to determine the effectiveness of the plan.

District leadership and the Racial Equity Advisory Council will monitor the progress of plan implementation and outcomes. Based on that monitoring, specific implementation strategies under a given action step in the plan may be adjusted to improve performance based on that monitoring. Monitoring occurs on a bi-monthly basis with each of the accountable administrators listed in the plan.

As required by Board Policy 09.131, the Board will receive a progress report twice per year regarding implementation of the JCPS Racial Educational Equity Plan, and progress on meeting measurable goals established in the plan. Also, the District and the Advisory Council will host at least two community conversations per year to hear from community members regarding issues relating to racial educational equity and to provide status reports regarding the implementation of the plan. Progress toward implementation of the policy and the reduction in gaps in achievement, expectations, opportunities and disciplinary actions shall be considered as part of the measurements of the success of the District.

Diversity in Curriculum, Instruction, and Assessment

Activities

- Asst. Sups. and Principals create Smart PGP goals to monitor the growth of Brown and Black students in each school
- Schools set individual student goals and provide acceleration opportunities for students of color
- Refine K-8 curriculum frameworks with curriculums, resources, and interventions focusing on racial equity to enhance learning experiences
- Assist teachers to create and implement culturally relevant lessons
- Use formative assessment data to differentiate instructional strategies to meet the needs of students of color
- Expand Out-of-School-Time (OSTs) programs for students below grade level. Reach out to families of color for student participation
- Provide students of color with self-affirming opportunities to reflect on personally important values

How Will We Measure Curriculum, Instruction, and Assessment?

Progress Measures

- % of students of color that met growth and/or achievement benchmarks in reading and math - [Vital Signs]
- % students of color predicted PD on state testing reading and math
- % of students of color not flagged in MAP Fluency - [Vital Signs]
- % students of color that participate in Elev8 for at least 1 semester
- % students of color that participate in summer learning
- % of students of color participated in DEP OST Programs
- Increase % of students of color (Grades 4, 7, and 10) who successfully completed a backpack milestone - [Vital Signs]

Goal

- Accelerate the % of students of color who are P/D on State Testing in Reading & Math from 36% (ES-R) 36% (MS-R) and 37% (HS-R) and 29% (ES-M) 27% (MS-M) and 29% (HS-M) to ____%.

School Culture & Climate

Activities

- Provide strategies to assist educators in building relationships and engaging students of color
- Provide school level resources and services to remove learning barriers for students of color
- Engage families and community members via resources and wrap-around services for families of color

How Will We Measure School Culture and Climate?

Progress Measures

- Increase student % attendance by race
- Decrease % of students chronically absent by race
- Increase % of students with one or less referrals by race
- Decrease % of students with referrals by race
- Increase % of parent agreement on CSS item "JCPs works hard to build trusting relationships with families" by race

Goal

- *Increase in % of students of color reported sense of belonging from 84.1% (ES) 77.2% (MS) and 74.8% (HS) to ____%*

Staffing & Classroom Diversity

Activities

- Attract qualified prospective educators of color
- Recruit and develop high-quality certified teachers of color
- Monitor race disproportionalities in interviews
- Establish Equity-Centered Pipeline Initiative (Wallace ECPI)

How Will We Measure Staffing & Classroom Diversity?

Progress Measures

- Increase % of teachers of color
- Increase % of administrators of color

Goal

- *Increase in percent teachers of color (25% or above), administrators of color (40% or above), and retention of teachers of color (90% or above)*

Programmatic Access

Activities

- Refine identification procedures to select students of color for advance programs (AP, GT, etc.)
- Provide students of color college/career opportunities
- High school students of color to receive a personalized scheduling conference
- 9th - 11th grade students of color to take a single session CERT assessment
- Monitor students of color not meeting benchmarks to complete CERT modules

How Will We Measure Programmatic Access?

Progress Measures

- Increase % students of color identified as Gifted/Talented
- Increase % students of color projected graduation rate
- Increase % of 11th grade students of color who met or exceeded the benchmarks in reading and math CERT assessment - [Vital Signs]
- Increase % of 12th grade students of color who met or exceeded the academic postsecondary benchmark measures - [JCPS Readiness Dashboard]

Goal

- *Increase in post-secondary readiness for students of color from 73.9% (average) to ____%.*

Evaluating Board Policy and Administrative Procedures

Activities

- Use equity-focused guiding questions (REAP) to make decisions that support equitable student outcomes
- Provide services and programs that intend to support equitable learning environment
- Engage various stakeholders to examine school/district policies and practices
- Monitor racial equity progress in schools

How Will We Measure Evaluating Board Policy and Administrative Procedures?

Progress Measures

- # of submitted REAPs
- # of District initiative (MOUs, MOAs, and PSCs) have gone through REAP process
- # of board action items and board policies filtered through REAP - [REAP Dashboard]
- # of schools embedded rating for Domain 6 in EMPT

Goal

- Increase in % of total REAPs determined to move forward with no changes from 70% (school) and 93.3% (district) to ____%.

APPENDIX I: JCPS'S EQUITY MONITORING PROGRESS TOOL (EMPT) 2025-2026

2025-2026 Guidance for Completion

Review the Racial Equity Policy Expectations, the School Performance Expectations, **AND** the Evaluation Feedback from the 24-25 school year with **ALL** EMPT Contributors.

Review all **Continuous Monitoring Tasks** below to be aware of their due dates and purpose, then determine your 25-26 **Racial Equity Plan** with EMPT Contributors for the upcoming school year. **Note that these Racial Equity Plans (SMART Goals) are no longer required to be recorded within your school's larger Racial Equity Profile from year-to-year.**

Review the **SLIDES 1 THROUGH 12** of the [Equity Monitoring Progress Tool \(EMPT\) Guidebook](#) regardless of your level of comfort with the EMPT or the evaluation feedback in your school's Racial Equity Profiles. As needed, synthesize all other relevant information for **ALL 25-26 EMPT Contributors**.

Monthly, leverage your school's conveying of their Racial Equity Committee to document **both Linked and Narrative Evidence** about the racial equity work being done in your school throughout the year. Ensure that Linked Evidence can be Viewed by anyone in JCPS. Ensure that Narrative Evidence fully articulates what the Linked Evidence is, why it was chosen, **AND** why it meets either the **Racial Equity Policy Expectation OR the School Performance Expectation**.

Note that **ALL** spaces where EMPT Contributors are expected **AND** required to respond are coded in **GREEN** with directions on what is to be provided. **This document should not otherwise be altered in any way.** As needed, utilize the document Outline to navigate this document.

2025-2026 Continuous Monitoring Tasks

Task	Due Dates	Purpose
Racial Equity Committees	Friday, August 22nd, 2025	Provide relevant members of the Department of Diversity, Equity, and Poverty with direct and up-to-date contact information so that all individuals leading for racial equity are appropriately informed and supported in the work.
Racial Equity Plan	Friday, August 22nd, 2025	Indicate the Domain (no more than 2) of focus for your school's racial equity work for the upcoming

		school year to ensure coaching, resources, and supports that align with your goals are provided from the Department of Diversity, Equity, and Poverty. This task WILL NOT be considered complete until it is submitted via the Racial Equity Plan Submission Form .
Fall Progress Update	Monday, October 6th, 2025 to Friday, October 17th, 2025	Provide necessary quantitative and qualitative data that drives bi-monthly meetings between your Zone Leadership Team and the Executive Administrative of the Department of Diversity, Equity, and Poverty about the racial equity work occurring in your school/Zone.
Mid-Year Progress Update	Monday, November 24th, 2025 - Friday, December 5th, 2025	
Winter Progress Update	Monday, January 26th, 2026 - Friday, February 6th, 2026	
End-Of-Year Progress Update	Monday, April 6th, 2026 - Friday, April 17th, 2026	

2025-2026 EMPT TO BE COMPLETED FOR EVALUATION AND FEEDBACK BY ELEMENTARY: FRIDAY, MAY 8TH, 2026 MIDDLE/HIGH: FRIDAY, MAY 22ND, 2026	
Contributors PLEASE LIST ALL CONTRIBUTORS, THEIR ROLE, AND THEIR EMAILS FOR PURPOSES OF ACCESS, EVALUATION, AND FEEDBACK.	
Domain 1: Diversity in Curriculum, Instruction, and Assessment	
<i>Racial Equity Policy Expectation 1.1</i> <i>School is creating original content, expanding on district curriculum resources, and/or supplementing provided district curriculum so that all materials are inclusive, reflective, and validating of Students of Color, as detailed by the Affirming Racial Equity Tool.</i>	
Six Systems Alignment To access the alignment and explanation for Domain 1, Racial Equity Policy Expectation 1, click here .	
Linked Evidence CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE	Narrative Evidence CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.

EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.					
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color <u>only occasionally and in only some content areas</u> .	Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color <u>regularly and in the majority of content areas</u> .	Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color <u>regularly and in all content areas</u> . AND PLCs in all content areas <u>utilize the ARE Tool regularly</u> .	Curriculum materials are created, expanded upon, or supplemented to <u>address intersectionality, societal issues, and contextualize real world situations regularly and in all content areas</u> . AND PLCs in all content areas <u>utilize the ARE Tool regularly with coaching and feedback from school leaders</u> . AND Achievement data has increased for Students of Color.	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 1.1					
Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.					
Initial: Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color only occasionally and in only some content areas. At this performance level, contributions are limited to annual awareness months and cultural celebrations that are multicultural in focus or are surface-level only. By “only in some content areas”, this means that contributions are not integrated into <i>all content areas</i> being taught in your building including those elective courses, related arts, and special areas offered at each school. This also means that contributions are available for all students to experience through curriculum materials including those who are labeled ECE or MLL.					
Growing: Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color regularly and in the majority of content areas. At this performance level, contributions may include awareness months and cultural celebrations, but purposefully incorporate the contributions of People of Color in all lessons/units of study. The impact and significance of these contributions are positioned at the forefront of student learning. By “in the majority of content areas”, this means					

that contributions have been incorporated into almost all content areas, but school leaders have failed to apply this expectation school-wide. Again, this also means that contributions are available for all students to experience through curriculum materials including those who are labeled ECE or MLL. Embedded: Curriculum materials are created, expanded upon, or supplemented to include the contributions of People of Color regularly and in all content areas. Evidenced PLC documentation showcases intentional utilization of relevant ARE Tool Components. Linked and narrative evidence is accompanied by narrative evidence that explains how, when, and where curriculum is being modified or supplemented to reflect the needs, identities, and/or interests of students. All evidence is demonstrative of these expectations across all grade levels and content areas. Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. Additionally, all curriculum materials include intersectionality when relevant, address societal issues both current and historic, and are contextualized within current local and global events. All linked and narrative evidence showcases how school leaders have systematized support for classroom educators in how they utilize the ARE Tool to support curricular decision-making, and PLCs with evidence of coaching and feedback provided to all classroom educators by members of the school leadership team. Achievement data shows increased outcomes for cohorts of Students of Color across multiple school years. NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the EMPT Guidebook for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.					
Racial Equity Policy Expectation 1.2 <i>School is actively utilizing culturally responsive instructional practices that improve learning outcomes for Students of Color.</i>					
Six Systems Alignment To access the alignment and explanation for Domain 1, Racial Equity Policy Expectation 2, click here.					
Linked Evidence CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		Narrative Evidence CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Initial Culturally responsive instructional practices are <u>utilized only occasionally</u> and <u>in only some content areas</u>.	Growing Culturally responsive instructional practices are <u>utilized regularly</u> and <u>in the majority of content areas</u>.	Embedded Culturally responsive instructional practices are <u>utilized regularly</u> and <u>in all content areas</u>.	Dynamic & Robust Culturally responsive instructional practices are <u>utilized regularly</u> and <u>in all content areas</u>.	Evaluation Feedback YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE
			AND PLCs in all content areas <u>utilize the ARE Tool regularly</u>.	AND PLCs in all content areas <u>utilize the ARE Tool regularly with coaching and feedback from school leaders</u>. AND Achievement data has increased for Students of Color.	LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 1.2 Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation. Initial: Culturally responsive instructional practices are utilized only occasionally and in only some content areas. At this performance level, linked and narrative evidence does not explicitly indicate what instructional practices are being utilized OR linked and narrative evidence confuses “instructional practices” with “curriculum” or “assessment”. By “only in some content areas”, this means that these instructional practices are not integrated by school leader expectation into all content areas being taught in your building and that these instructional practices are utilized with all students, including those who are labeled ECE or MLL. Growing: Culturally responsive instructional practices are utilized regularly and in the majority of content areas. Instructional practices may still uphold educational practices, traditions, and trends that are harmful to Students of Color, despite intent. At this performance level, instructional practices have been implemented to purposefully improve learning outcomes for Students of Color. Narrative evidence documents how these instructional practices were selected. Linked and narrative evidence provides school-level data that indicates adopted practices are improving learning outcomes for Students of Color. By “in the majority of content areas”, this means that contributions have been incorporated into almost all content areas, but school leaders have failed to apply this expectation school-wide. Again, this also means that these instructional practices are utilized with all students, including those who are labeled ECE or MLL. Embedded: Culturally responsive instructional practices are utilized regularly and in all content areas. Evidenced PLC documents showcase intentional utilization of relevant ARE Tool Components. Linked evidence is accompanied by narrative evidence that explains how, when, and where instructional practices are utilized. If lesson plans are utilized as linked evidence the corresponding narrative evidence highlights and explains how the instructional practices are being selected and utilized. Instructional practices have been collaboratively selected based on school leader reflection, input from classroom educators, and evidence of prior success with similar student populations. All linked and evidence is demonstrative of these expectations across all grade levels and content areas. Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. All linked and narrative evidence showcases how school leaders have systematized support for classroom educators in how they utilize the ARE Tool to support implementation of culturally responsive instructional practices, and PLCs with evidence of coaching and feedback provided to all classroom educators by members of the school leadership team. Achievement data shows increased outcomes for cohorts of Students of Color across multiple school years. NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the EMPT Guidebook for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered					

Dynamic and Robust.					
Racial Equity Policy Expectation 1.3					
School ensures multiple forms of assessment are utilized and that all classroom educators provide actionable feedback and revision opportunities until mastery is achieved by all students.					
Six Systems Alignment					
To access the alignment and explanation for Domain 1, Racial Equity Policy Expectation 3, click here .					
Linked Evidence		Narrative Evidence			
CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Multiple forms of assessment are <u>utilized only occasionally and in only some content areas</u> .	Multiple forms of assessment are <u>utilized regularly and in the majority of content areas</u> .	Multiple forms of assessment are <u>utilized regularly and in all content areas</u> . AND Classroom educators provide all students with actionable feedback and <u>some revision opportunities</u> .	Multiple forms of assessment are <u>utilized regularly and in all content areas</u> . AND Classroom educators provide all students with actionable feedback and <u>unlimited revision opportunities</u> . AND Achievement data has increased for Students of Color.	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 1.3					

Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.

Initial: Multiple forms of assessment are utilized only occasionally and in only some content areas. At this performance level, evidenced assessment practices rely upon a few different forms of assessment, including traditional forms. Evidenced assessment practices, or lack thereof, reveal that assessments are not viewed, valued, or designed as an intentional means to capture or communicate student progression towards mastery. By "only in some content areas", this means that multiple forms of assessment are not integrated into *all content areas* being taught in your building including those elective courses, related arts, and special areas offered at each school. This also means evidencing that multiple forms of assessment are made available to all students, including those who are labeled ECE or MLL.

Growing: Multiple forms of assessment are utilized regularly and in the majority of content areas. At this performance level, evidenced assessment practices may include some traditional forms of assessment, but incorporate student choice and voice in terms of modality. By "in the majority of content areas", this means that forms of assessment have been incorporated into almost all content areas, but school leaders have failed to apply this expectation school-wide. Again, this also means that multiple forms of assessment are made available to all students, including those who are labeled ECE or MLL.

Embedded: Multiple forms of assessment are utilized regularly and in all content areas, and classroom educators provide all students with actionable feedback and some revision opportunities, including those students labeled ECE or MLL. Evidenced PLC documentation showcases intentional utilization of relevant ARE Tool Components. Linked evidence is accompanied by narrative evidence that explains how, when, and where varied forms of assessment are being utilized to meet the needs, identities, and/or interests of students. Linked evidence should include both formative and summative assessments. All linked and narrative evidence is demonstrative of these expectations across all grade levels and content areas.

Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. All linked and narrative evidence showcases how school leaders have systematized support for classroom educators in how they utilize the ARE Tool to support racially equitable assessment practices, and PLCs with evidence of coaching and feedback provided to all classroom educators by members of the school leadership team. Students are permitted to revise course work with feedback from classroom educators to showcase mastery without limitations within a given school year. Achievement data shows increased outcomes for cohorts of Students of Color across multiple school years.

NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the [EMPT Guidebook](#) for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.

Domain 2: Professional Development	
Racial Equity Policy Expectation 2.1	
<i>School faculty and staff engage in professional learning that addresses cultural responsiveness, implicit bias, intersectionality, racial identity, personal or structural racism, and practices that support inclusion.</i>	
Six Systems Alignment	
To access the alignment and explanation for Domain 2, Racial Equity Policy Expectation 1, click here .	
Linked Evidence	Narrative Evidence

CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	<u>Few</u> faculty and staff members engage in professional learning that explicitly addresses the Racial Equity Policy Expectation above.	<u>Some</u> faculty and staff members engage in professional learning that explicitly addresses the Racial Equity Policy Expectation above.	<u>Most</u> faculty and staff engage in professional learning that explicitly addresses the Racial Equity Policy Expectation above.	<u>All</u> faculty and staff members engage in professional learning that explicitly addresses the Racial Equity Policy Expectation above.	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 2.1					
Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.					
Initial: At this performance level, “few” means less than 50% of the school faculty and staff based on provided metrics.					
Growing: At this performance level, “some” means between 50% and 75% of the school faculty and staff based on provided metrics.					
Embedded: At this performance level, “most” means over 75% of the school faculty and staff based on provided metrics.					
Dynamic & Robust: All constitutes every individual employed in a school. This includes all certified faculty serving as classroom educators and classified support staff who ensure daily operations occur and who interact with students, caregivers, families, and other relevant stakeholders. School leaders evidence a professional learning plan that addresses all members of the faculty and staff with the corresponding topics that will be most impactful, ranging from cultural responsiveness, implicit bias, intersectionality, racial identity, personal or structural racism, to practices that support inclusion. This evidence should be explicitly delineated by role groups. Linked and narrative evidence includes professional learning at the school level, District level, and national level as well as professional learning mandated by the Department of Diversity, Equity, and Poverty. This linked evidence also accounts for attendance and engagement in these opportunities year-long. Narrative evidence clearly articulates school leader expectations for engagement during professional learning, how these expectations have been demonstrated for the faculty and staff, and how they are enforced for accountability year-long. Narrative evidence must also explicitly indicate alignment of all evidenced professional learning to the topics within Racial Equity Policy Expectation 2.1.					
NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the EMPT Guidebook for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.					

Racial Equity Policy Expectation 2.2					
School leadership, faculty, and staff reflect on professional learning that addresses cultural responsiveness, implicit bias, intersectionality, racial identity, personal or structural racism, and practices that support inclusion.					
Six Systems Alignment					
To access the alignment and explanation for Domain 2, Racial Equity Policy Expectation 2, click here .					
Linked Evidence		Narrative Evidence			
CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Reflections on professional learning occur <u>only occasionally and with few members of the faculty or staff.</u>	Reflections on professional learning occur <u>regularly and with most members of the faculty or staff.</u>	Reflections on professional learning occur <u>regularly and with all members of the faculty and staff.</u>	Reflections on professional learning occur <u>year-long and with all members of the faculty and staff.</u> AND School leaders have systemized faculty reflections of professional learning to facilitate continuous professional growth.	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 2.2					
Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.					
Initial: Reflections on professional learning occur only occasionally and with few members of the faculty or staff. At this performance level, “few” means less than 50% of the school faculty and staff based on provided metrics. Linked and narrative evidence does not indicate that reflections on professional learning occur in alignment to a session within a larger year-long professional learning plan.					
Growing: Reflections on professional learning occur regularly and with most members of the faculty or staff. At this performance level, “most” means over 75% of the school					

faculty and staff based on provided metrics. Linked and narrative evidence indicates that reflections on professional learning are either not occurring monthly or are occurring without alignment to a session within a larger year-long professional learning plan. Embedded: Reflections on professional learning occur regularly and with all members of the faculty and staff. At this performance level, "all" means every individual employed in a school. This includes all certified faculty serving as classroom educators and classified support staff who ensure daily operations occur and who interact with students, caregivers, families, and other relevant stakeholders. Linked and narrative evidence highlights the expectations established for reflecting on professional learning that occurs monthly and with purposeful alignment to sessions within a year-long professional learning plan. Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. Again, all constitutes every individual employed in a school. This includes all certified faculty serving as classroom educators and classified support staff who ensure daily operations occur and who interact with students, caregivers, families, and other relevant stakeholders. School leaders evidence a professional learning plan with embedded reflections that addresses all members of the faculty and staff with the corresponding topics that will be most impactful from cultural responsiveness, implicit bias, intersectionality, racial identity, personal or structural racism, and practices that support inclusion. Linked and narrative evidence includes professional learning at the school level, District level, and national level. This linked evidence also accounts for attendance and engagement in these opportunities year-long. Narrative evidence clearly articulates school leader expectations for engagement during professional learning, how these expectations have been demonstrated for the faculty and staff, and how they are enforced for accountability year-long. School leaders also provide narrative evidence explaining how feedback and reflection on professional learning sessions year-long is leveraged and utilized to create continuous growth in all faculty and staff. NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the EMPT Guidebook for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.	
Domain 3: School Culture and Climate	
Racial Equity Policy Expectation 3.1	
School addresses implicit biases to foster a sense of belonging for all stakeholders by affirming, including, and welcoming the cultural and racial identities of all students, caregivers, and families.	
Six Systems Alignment	
To access the alignment and explanation for Domain 3, Racial Equity Policy Expectation 1, click here .	
Linked Evidence CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.	Narrative Evidence CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.

School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Analysis of implicit biases occurs <u>only occasionally</u> and <u>with few members of the faculty or staff</u>. AND School climate and culture makes <u>few attempts</u> to affirm, include, <u>or</u> welcome the <u>cultural or racial identities</u> of students, caregivers, and families.	Analysis of implicit biases occurs <u>regularly</u> and <u>with most members of the faculty or staff</u>. AND School climate and culture makes <u>regular attempts</u> to affirm, include, <u>and</u> welcome the <u>cultural and racial identities</u> of students, caregivers, and families.	Analysis of implicit biases occurs <u>regularly</u> and <u>with all members of the faculty and staff</u>. AND School climate and culture makes <u>regular, successful attempts</u> to affirm, include, <u>and</u> welcome the <u>cultural and racial identities</u> of students, caregivers, and families.	Analysis of implicit biases occurs <u>year-long</u> and <u>with all members of the faculty and staff</u>. AND School climate and culture makes <u>regular, successful attempts</u> to affirm, include, <u>and</u> welcome the cultural and racial identities of students, caregivers, and families <u>in response to school data</u>. AND Data related to sense of belonging has increased for Students of Color.	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 3.1 Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation. Initial: Analysis of implicit biases occurs only occasionally and with few members of the faculty or staff. At this performance level, "occasionally" means that bias checking and conversations about implicit bias are not occurring monthly. Additionally, "few" means less than 50% of the school faculty and staff based on provided metrics. School climate and culture makes few attempts to affirm, include, or welcome the cultural or racial identities of students, caregivers, and families. Linked and narrative evidence does not address the cultural and racial identities present in the school's demographics. This may mean that the school acknowledges annually occurring cultural celebrations, but does nothing more explicit or intentional around the racial identities present. Evidence regarding the school's climate and culture does not incorporate students, caregivers, and families, and addresses only one or two of the three groups. Growing: Analysis of implicit biases occurs regularly and with most members of the faculty or staff. At this performance level, "regularly" means that bias checking and conversations about implicit bias are occurring monthly and school-wide in a variety of settings. Additionally, "most" means over 75% of the school faculty and staff based on provided metrics. School climate and culture makes regular attempts to affirm, include, and welcome the cultural or racial identities of students, caregivers, and families. Linked and narrative evidence explicitly and purposefully addresses the cultural and racial identities present in the school's demographics. This may mean that the school acknowledges annually occurring cultural celebrations, and does so purposefully with clear connections to the cultural and racial identities present. Evidence analyzes and discusses the ways in which the cultural and racial identities of the school's demographics are being utilized in conjunction with goals and outcomes for the school's climate and culture. Evidence incorporates purposeful feedback from students, caregivers, and families.					

Embedded: Analysis of implicit biases occurs regularly and with all members of the faculty and staff. At this performance level, “regularly” means that bias checking and conversations about implicit bias are occurring monthly and school-wide in a variety of settings. Additionally, “all” means every member of the school faculty and staff based on provided metrics. School climate and culture makes regular, successful attempts to affirm, include, and welcome the cultural and racial identities of students, caregivers, and families. Linked and narrative evidence is utilized to analyze and discuss the ways in which the cultural and racial identities of the school’s demographics are being utilized in conjunction with goals and outcomes for the school’s climate and culture. Narrative evidence also discusses the ways in which these efforts have been successful through purposeful feedback from students, caregivers, and families.

Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. All decisions made regarding school climate and culture are done in response to the most current and relevant school data. Additionally, CSS data is utilized alongside qualitative data collected at the school level to indicate consistent growth in sense of belonging for Students of Color.

NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the [EMPT Guidebook](#) for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.

Domain 4: Programmatic Access					
Racial Equity Policy Expectation 4.1					
School is increasing enrollment of Students of Color in accelerated educational courses and programs, enrichment opportunities, and extracurricular activities.					
Six Systems Alignment					
To access the alignment and explanation for Domain 4, Racial Equity Policy Expectation 1, click here .					
Linked Evidence		Narrative Evidence			
CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy	School has <u>addressed few barriers to accelerated courses, enrichment</u>	School has <u>addressed some barriers</u> to accelerated courses,	School has <u>addressed most barriers</u> to accelerated courses,	School has <u>addressed all known barriers</u> to accelerated courses,	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL

Expectation.	opportunities, or extracurricular activities in policies and procedures.	enrichment opportunities, and extracurricular activities in policies and procedures.	enrichment opportunities, and extracurricular activities in policies and procedures.	enrichment opportunities, and extracurricular activities in policies and procedures.	OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
			AND Data related to enrollment has shown <u>irregular increases</u> for Students of Color.	AND Data related to enrollment has shown <u>regular increases</u> for Students of Color.	
			AND Data related to achievement in those courses has shown <u>irregular increases</u> for Students of Color.	AND Data related to achievement in those courses has shown <u>regular increases</u> for Students of Color.	

Explanation of School Performance Expectations for Racial Equity Policy Expectation 4.1

Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.

Initial: School has addressed few barriers to accelerated courses, enrichment opportunities, or extracurricular activities in policies and procedures. Linked and narrative evidence do not indicate awareness amongst the administrative team of current racial disparities in accelerated courses, enrichment opportunities, and extracurricular activities, or the administrative team has identified some barriers prevalent in their school, but has done so with limited school-level data. No school-wide plans or systems are in place to address increasing enrollment in accelerated courses, enrichment opportunities, or extracurricular activities.

Growing: School has addressed some barriers to accelerated courses, enrichment opportunities, and extracurricular activities in policies and procedures. Linked and narrative evidence indicates awareness of racial disparities in accelerated courses, enrichment opportunities, and extracurricular activities. Additionally, a school-wide plan or system has been developed and is being enacted to address these school-specific racial disparities in accelerated courses, enrichment opportunities, and extracurricular activities. Barriers may still exist, but are addressed in the narrative evidence in relation to school-wide plans or systems.

Embedded: School has addressed most barriers to accelerated courses, enrichment opportunities, and extracurricular activities in policies and procedures. Linked and narrative evidence identifies root causes of racial disparities in accelerated courses, enrichment opportunities, and extracurricular activities. A school-wide plan or system has been developed and is being enacted to address these school-specific racial disparities in accelerated courses, enrichment opportunities, and extracurricular activities. Data indicates enrollment of Students of Color has increased in either accelerated courses, enrichment opportunities, or extracurricular activities. Achievement data for Students of Color in accelerated courses may indicate irregular growth trends across school years for groups of students.

Dynamic & Robust: At this performance level, all descriptors for Embedded are clearly and consistently evidenced. Data indicates enrollment of Students of Color has increased in accelerated courses, enrichment opportunities, and extracurricular activities. Achievement data for Students of Color in accelerated courses must indicate positive growth trends across school years for groups of students.

NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the [EMPT Guidebook](#) for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.

Domain 5: Staffing and Classroom Diversity

Racial Equity Policy Expectation 5.1

School utilizes the district applicant pool as well as interview processes and protocols that result in the recruitment and retention of faculty and staff that reflect the racial, ethnic, and linguistic diversity of the student body.

Six Systems Alignment

To access the alignment and explanation for Domain 5, Racial Equity Policy Expectation 1, click [here](#).

Linked Evidence		Narrative Evidence			
CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	Interview panels <u>irregularly</u> reflect the diversity of the student body. AND Interview questions <u>irregularly</u> reflect the diversity of the student body.	Interview panels <u>regularly</u> reflect the diversity of the student body. AND Interview questions <u>regularly</u> reflect the diversity of the student body.	Interview panels <u>regularly and purposefully</u> reflect the diversity of the student body. AND Interview questions <u>regularly and purposefully</u> reflect the diversity of the student body.	Interview panels <u>regularly and purposefully</u> reflect the diversity of the student body and <u>incorporate stakeholder voices</u> . AND Interview questions <u>regularly and purposefully</u> reflect the diversity of the student body and <u>racial equity goals of the school</u> .	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.

				AND Alterations in hiring processes and procedures have resulted in the recruitment and/or retention of Faculty of Color.	

Explanation of School Performance Expectations for Racial Equity Policy Expectation 5.1

Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.

Initial: School interview committees include an individual of color and interview questions do not specifically address the school's belief about diversity, equity, and inclusion.

Growing: School interview committees include an individual of color and interview questions address the school's belief about diversity, equity, and inclusion. The school is reliant on district advertisement/recruitment to support in the filling of open/vacant positions.

Embedded: School interview committees are inclusive of individuals of color. Interview questions are reflective of the school's belief about diversity, equity, and inclusion. The school provides evidence of internal recruitment and retention strategies.

Dynamic/Robust: Embedded, plus interview question/s require candidates to explain/demonstrate previous experience as it relates to racial equity, interview committees include stakeholders from multiple role groups. Working conditions data suggest (IMPACT, CSS, Teach Upbeat, internally created) teacher/staff satisfaction and retention data is upward trending.

NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the [EMPT Guidebook](#) for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.

Domain 6: Reflections of Equitable Practices

Racial Equity Policy Expectation 6.1

School appropriately utilizes the Racial Equity Analysis Protocol as dictated by the Best Practice Guidelines to regularly assess and/or revise all school and classroom initiatives, policies, and procedures from year-to-year.

Six Systems Alignment

To access the alignment and explanation for Domain 6, Racial Equity Policy Expectation 1, click [here](#).

Linked Evidence		Narrative Evidence			
CONTRIBUTORS TO PROVIDE LINKED EVIDENCE THAT CORRESPONDS TO THE SCHOOL PERFORMANCE EXPECTATIONS DETAILED BELOW AS WELL AS THE RACIAL EQUITY POLICY EXPECTATIONS LISTED ABOVE HERE.		CONTRIBUTORS TO PROVIDE CORRESPONDING NARRATIVE EVIDENCE HERE.			
School Performance Expectations					
Not Evidenced	Initial	Growing	Embedded	Dynamic & Robust	Evaluation Feedback
Linked and narrative evidence fail to address the Racial Equity Policy Expectation.	School leaders have utilized the REAP on school-level initiatives, policies, <u>or</u> procedures. AND Required REAPs provided show <u>minimal depth</u> of consideration <u>or</u> understanding of the intersections of policy and race. AND Classroom educators do not utilize the REAP to analyze classroom policies or procedures.	School leaders have utilized the REAP on school-level initiatives, policies, <u>and</u> procedures. AND Required REAPs provided show <u>some depth</u> of consideration <u>or</u> understanding of the intersections of policy and race. AND Classroom educators utilize the REAP to analyze classroom policies and procedures with <u>no coaching or documented feedback from school leaders</u> .	School leaders have utilized the REAP on school-level initiatives, policies, <u>and</u> procedures. AND Required REAPs provided show <u>some depth</u> of consideration <u>and</u> understanding of the intersections of policy and race. AND Classroom educators utilize the REAP to analyze classroom policies and procedures with <u>irregular coaching and documented feedback from school leaders</u> .	School leaders have utilized the REAP on school-level initiatives, policies, <u>and</u> procedures <u>with evidenced impact</u> . AND Required REAPs provided show <u>maximal depth</u> of consideration <u>and</u> understanding of the intersections of policy and race. AND Classroom educators utilize the REAP to analyze classroom policies and procedures with <u>regular coaching and documented feedback from school leaders</u> .	YOUR ASSIGNED DEP SPECIALIST WILL HIGHLIGHT YOUR LEVEL OF SCHOOL PERFORMANCE TO THE LEFT AND PROVIDE FEEDBACK FOR POTENTIAL NEXT STEPS HERE.
Explanation of School Performance Expectations for Racial Equity Policy Expectation 6.1					
Not Evidenced: Linked and narrative evidence fail to address the language of the Racial Equity Policy Expectation and School Performance Expectation.					
Initial: There is evidence provided for all district required REAPs (if applicable). REAP is only conducted by one individual. Questions have not been answered completely (Blank, Yes/No answers or few word sentences that do not attend to the questions thoroughly) and there is no depth of consideration to the racial groups that would be impacted by the policy, practice, procedure and how they may be impacted. Use/completion of the REAP is relegated to administration, school leadership teams or SBDM/ALT.					

Growing: There is evidence provided for all district required REAPs (if applicable). REAP is conducted by a team of two to three individuals. Questions have been answered completely (complete sentences/explanation) with some depth of consideration of the racial groups that would be impacted by the policy, practice, procedure and how they may be impacted. There is evidence that the REAP has been extended beyond administration, school leadership teams, SBDM/ALT to the classroom level (teachers), but there is no documentation/evidence of coaching or feedback provided by school administration in the use of REAP. Embedded: There is evidence provided for all district required REAPs (if applicable), in addition to other school level REAPs. REAP is conducted by a team, consisting of 4 or more individuals. All questions are answered completely, with detailed explanation of potential impact of the discussed policy, procedure, practice on specific racial groups. Data is provided where applicable. Problems or challenges identified have progressive resolutions or suggestions. There is evidence that the REAP has been extended beyond administration, school leadership teams, SBDM/ALT to the classroom level (teachers), with documentation/evidence of coaching or feedback provided by school administration in the use of REAP. Dynamic/Robust: There is evidence provided for all district required REAPs (if applicable), in addition to other school level REAPs. REAP is conducted by a team, consisting of 4 or more individuals. All questions are answered completely, with detailed explanation of potential impact of the discussed policy, procedure, practice on specific racial groups. In addition, research is referenced as it relates to the policy, procedure, and/or practice that has been taken through the REAP. Data is provided where applicable. Evidenced impact is provided as a result of changes to policy, procedures, practices that have been taken through the REAP. There is evidence that the REAP has been extended beyond administration, school leadership teams, SBDM/ALT to the classroom level (teachers) and other staff (as applicable), with documentation/evidence of coaching or feedback provided by school administration in the use of REAP. NOTE: Feedback provided is in the form of questions that, once addressed, can support the school in fostering practices and systems that will produce Dynamic and Robust outcomes. Dynamic and Robust outcomes support a future state in which school leaders have adopted a purposefully anti-racist school leadership model. See the EMPTY Guidebook for an expanded list of questions, as well as potential artifacts, that will push schools towards adopting and systematizing practices that are considered Dynamic and Robust.

APPENDIX J: JCPS'S AFFIRMING RACIAL EQUITY (ARE) TOOL

ATTENTION: The highlight portion of this document should be deleted for planning purposes once read.

GUIDANCE FOR COMPLETION

- ❖ Classroom educators should strive to evidence at least 1 Lesson Descriptor from all 6 Components of the ARE Tool for each unit of study.
- ❖ It is NEVER an expectation that all 36 Lesson Descriptors will be evidenced in a single lesson OR a single unit of study, however, ALL 36 Lesson Descriptors should be evidenced over the course of a school year.
- ❖ Utilize [The ARE Tool](#), [The ARE Tool & PLC Framework Alignment](#), [the ARE Tool & the Five Pursuits](#), and the [Culturally Responsive Teaching Unit Templates](#) as helpful resources when engaging in this work.
- ❖ Utilize the "Artifacts & Explanation of Implementation" column to document artifacts of student learning, relevant lesson materials, lesson resources, lesson tasks, PLC conversations, and/or contextualized narrative explanation to aid in coaching conversations.
- ❖ This planning document will be considered incomplete until the "Post-Unit Reflection" is completed.

DIRECTIONS FOR COACHES & ADMINISTRATORS: The Comment function in this Google Doc is to be utilized to provide both individual classroom educators and PLCs with coaching, feedback, resources, and support year-long. Implementation of this document can be utilized as evidence in Domains 1 and 2 of your 25-26 EMPT.

CONTENT AREA:

GRADE LEVEL:

UNIT NUMBER AND/OR TITLE:

STANDARDS ADDRESSED:

TIMELINE OF IMPLEMENTATION:

Content Integration	
Teachers regularly utilize examples from a wide variety of cultures and groups in lessons and units.	
Lesson Descriptors	Artifacts & Explanation of Implementation
The lesson's materials reflect diverse cultures and identities.	

The lesson's tasks reflect diverse cultures and identities.	
The lesson's secondary resources reflect diverse cultures and identities.	
The lesson's materials/tasks/secondary resources reflect the students in the class. (Mirrors)	
The lesson's materials/tasks/secondary resources allow students to explore/understand others' experiences. (Windows)	
The content within the lessons is validating to individuals/groups that are typically underrepresented.	

Knowledge Construction	
Teachers intentionally plan lessons to ensure students understand how oppression and systemic racism influence knowledge and perceptions of knowledge.	
Lesson Descriptors	Artifacts & Explanation of Implementation
Teacher provides all students with the necessary background and historical context regarding bias, oppression, privilege, and/or systemic racism to purposefully engage in lessons.	
The lesson's materials and tasks develop students' academic skill sets through analysis, creative thinking, critical thinking, information literacy, inquiry, problem solving, quantitative literacy, reading, research skills, teamwork, and written and oral communication skills.	
The lesson's materials allow students to position themselves within the content to affirm their racial identities.	
The lesson's tasks allow students to assess, critique, and discuss the assumptions, values, and word choices represented in the lesson's materials.	
The lesson's tasks/secondary resources allow students to acknowledge and analyze oppression, power relationships, and privilege in the	

lesson's materials.	
The lesson's materials/tasks/secondary resources allow students to analyze the ways in which bias and cultural beliefs impact widely available information and "truthful" information.	

Prejudice Elimination Teachers intentionally plan lessons to build understanding and foster intergroup relations.	
Lesson Descriptors	Artifacts & Explanation of Implementation
Teachers are aware of their own internal biases and how those biases impact students' achievement and engagement in their classroom.	
Teachers have created and implemented a plan to engage in active bias-checking alongside their colleagues, especially within departments and PLCs.	
Teachers are aware of materials and tasks that may be considered controversial, demeaning, emotionally charged, inflammatory, or offensive to underrepresented groups.	
Teachers build lessons/units that encourage students' cultural humility by developing a sense of pride and value in their own culture and others through extensive learning.	
Lessons/units allow students to understand the impact of bias and stereotypes through varied materials/tasks/secondary resources.	
Lessons/units allow students to see underrepresented people in a range of traditional and nontraditional roles.	

Equitable Pedagogy Teachers modify methods, resources, and strategies to facilitate academic achievement of underrepresented societal groups.

Lesson Descriptors	Artifacts & Explanation of Implementation
Teachers create a community of learners through intentional use of cooperative learning strategies, shared responsibility, and teamwork.	
Teachers develop a tool box of instructional examples, methods, and practices that are culturally familiar to underrepresented students.	
Teachers utilize varied instructional methods to match students' learning preferences, to maintain students' attention, and to increase student interest in learning.	
Teachers ensure all students acquire necessary academic language to perform at high levels.	
Teachers hold all students to high academic expectations, providing the same rigorous academic content to all students through differentiation and scaffolding.	
Teachers present students with content that contextualizes real world situations, allowing students to address societal issues, not excluding controversial topics.	

Empowering Classroom Culture Teachers recognize the value of culture and race in relationship building with both students and families, so teachers build positive relationships that are the foundation for a healthy, inclusive, and safe learning environment.	
Lesson Descriptors	Artifacts & Explanation of Implementation
Teachers are affirming of race, ethnicity, culture, religion, class, gender, and sexual orientation when interacting with students and their families.	
Teachers establish a classroom culture that rejects educational traditions that work to harm students in underrepresented groups and maintain the status quo.	

Classrooms acknowledge and affirm the strengths of students' diverse heritage and identities through positive, supportive, and welcoming interactions.	
Classroom expectations, routines, and rules are affirming and equitable, providing student feedback and voice regularly.	
Established communication systems are inclusive, translated as needed, and varied, ensuring that all caregivers and families have equal access to necessary information.	
Caregivers are regularly invited to contribute to students' learning, participate in ongoing classroom conversations, and share their expertise.	

A.R.E. Through Assessment Teachers intentionally plan assessments that allow students to showcase their knowledge and mastery through cross-curriculum skill sets with an embedded and purposeful feedback cycle.	
Lesson Descriptors	Artifacts & Explanation of Implementation
Assessments and feedback exist in continuous cycles, allowing students to set goals, interact with curriculum, create an artifact of their learning, receive coaching, and revise their work until mastery is achieved.	
Feedback on all major assessments is actionable, specific, timely, and goal-oriented.	
Rubrics are co-created whenever possible and utilized throughout all feedback cycles to ensure clear communication and strong collaboration between students and teachers.	
Assessments allow students to demonstrate their growth in a wide variety of ways, such as: demonstration, essay, multiple choice, performance, portfolios, presentation, and/or self-assessment.	

Assessments balance intellectual and practical skill sets through the Success Skills and, wherever possible, are interdisciplinary in nature.	
PLCs disaggregate academic data to examine achievement disparities by race and gender using their school's Equity ScoreCard .	

Post-Unit Reflection

Utilize the following questions to complete a self-reflection or engage in a co-constructed reflection with your PLC.

- ❖ How did utilizing the ARE Tool impact your planning process for this unit of study?
- ❖ What questions did the ARE Tool generate for you about your content as you were planning?
- ❖ What are some explicit successes from teaching this unit that can be attributed to utilizing the ARE Tool? What are some areas for growth or revisions you would make should you re-teach this unit?
- ❖ How did utilizing the ARE Tool enhance or improve student learning and/or outcomes?

APPENDIX K: JCPS'S RACIAL EQUITY ANALYSIS PROTOCOL (REAP)

Racial Equity Analysis Protocol (SCHOOLS)

Date: _____

School Name: _____

Alignment to EMPT Domains:

- Domain1: Curriculum, Instruction, and Assessment
- Domain 2: Professional Development
- Domain 3: School Culture and Climate
- Domain 4: Programmatic Access
- Domain 5: Staffing and Classroom Diversity
- Other: _____

Name of Policy/Plan: _____

Filtered by: _____

REAP Goals and Guardrails

Is the document being filtered a Memorandum of Agreement / Understanding (MOA / MOU), Professional Service Contract (PSC), or Data Sharing Agreement (DSA)

- ☐ Yes
☐ No

Is the document you are filtering through the REAP

Board Action Item

- ☐ Yes
☐ No

Policy

- ☐ Yes
☐ No

REAP Questions	REAP Responses
1. What is the overarching purpose of the proposal/initiative/policy?	

2. Is the initiative or policy resourced to guarantee full implementation and monitoring?	☐ Yes ☐ No
3. Which racial/ethnic groups could be inequitably affected by this policy? How?	
4a. Which racial or ethnic group will have the most concerns with this proposal or initiative? Why?	Check all that apply: • African-American/Black • American Indian/Alaska Native • Asian • Hispanic/Latinx • Native Hawaiian/Pacific Islander • White • 2 ore More Races/Ethnicities • Other: _____
4b. Follow up to 4a: Why might these racial or ethnic groups have the most concerns with this policy/practice/initiative?	
5. What unintended consequences could result from the policy (racial inequities or otherwise)?	
6. Have stakeholders , particularly those most impacted by this decision, been meaningfully informed or involved in the discussion of the proposal? How did the process go? What was the feedback?	
7. What root causes may be producing and perpetuating racial inequities associated with this issue? Does this policy/practice/initiative deepen these inequities or improve them?	
8. Who (e.g., individual, department, team) is the main driver for improving racial equity for this particular proposal/initiative?	
Next Steps	Responses
9. After filtering the program, policy, or practice through the REAP, should Jefferson County Public Schools move forward with the program, policy, or practice? *	• Yes, no changes needed • Yes, with revisions • No

If yes with conditions, what changes need to be made in order to move forward?*	
Now that it is filtered, when does this program, policy, practice come into effect?	
Impact and Feedback	Responses
Is this policy/practice impacting any of the following outcomes? Choose the ONE best metric that applies, if any. (optional) Curriculum, Instruction, and Assessment • Students enrolled in courses specifically designed to consider other cultures' contributions and perspectives • Number of courses offered that consider cultural contribution and perspectives • Students of color who are transition ready • Students of color who are proficient or distinguished on KSA in Reading & Math Culture and Climate • Number of staff participating in culturally responsive/equity professional development • Suspensions for students of color • Restraints for students of color • Sense of belonging for students of color • Students of color who are chronically absent • Trust/Relationship with the families of students of color Staff and Classroom Diversity • Contracts with Minority/Women-owned businesses • Number/percent teachers of color • Number/percent administrators of color • Retention of teachers of color Programmatic Access • Students of color identified as Gifted & Talented • Students of color applying to magnet program(s) • Students of color enrolled in magnet program(s) • Students of color who completed higher level courses (AP, IB, Cambridge, dual credit) • Students of color with qualifying score/grade (AP, IB, Cambridge, dual credit) • Students of color participating in career pathways • Students of color participating in summer/extended learning programs • Number of college applications for students of color Central Office Commitment • Increase in funding to support students of color	

To what degree will this policy or practice impact the metric identified above? (optional)	• Little • Moderately • High
To what degree is the REAP tool helpful for improving racial equity in your school, on a scale from 1 to 5 (1 = not helpful to 5= very helpful)?	• 1 = Not Helpful • 2 • 3 • 4 • 5= Very Helpful
Please provide any feedback on the REAP tool. (optional)	

- *=reported to board via information item, work session, etc.
- Yes with conditions requires the policy, practice, initiative to be filtered through the REAP again.

APPENDIX L: JCPS'S LEADING FOR EQUITY, ACCOUNTABILITY, SUPPORT, AND EXPECTATIONS (LEASE) TOOL

Leading with Equity, Accountability, Support, and Expectations

1. How do you implement evidence-based practices to address specific academic needs for students of color in your school? (EMPT~ Domain 1)
 - a. How are they measured?
2. How have you remediated equality practices of various systems in your building to bring racial equity to historically underserved students? (EMPT~ Domain 6)
 - a. What was once equal, but is now equitable?
3. How have you built upon normalized practices and ushered in new practices that demonstrate academic and cognitive belonging for racialized students? (EMPT~ Domain 1)
4. How have you extended beyond interpreters, books, and translations to content/curriculum that is acceptable, familiar, and complimentary of diverse cultures daily/regularly? How is it monitored to ensure systems are similar amongst classrooms? (EMPT~ Domains 1 & 6)
5. How have you built relationships that extend past open houses, emails, and phone calls in order to welcome caregiver/family voice and input on how to best teach their child? (EMPT~Domain 3)
6. What quantifiable goals and identifiable practices have been established to decrease disproportionality in academics, suspensions, alternative school placement, and referrals to Exceptional Childhood Education (ECE)? How is it measured? How do you know if it's impactful? (EMPT- Domain 3)
7. How have you provided professional learning opportunities for your teachers to improve their equity practices in every class, lessons, GT/AP services, and community engagement? (EMPT~ Domains 1, 2 & 4)

JEFFERSON COUNTY PUBLIC SCHOOLS RESPONSE

JEFFERSON COUNTY PUBLIC SCHOOLS
VAN HOOSE EDUCATION CENTER
3332 NEWBURG ROAD
LOUISVILLE, KY 40218



June 26, 2026

The Honorable Allison Ball
Auditor of Public Accounts
Commonwealth of Kentucky
209 St. Clair Street
Frankfort, Kentucky 40601

Dear Auditor Ball,

On behalf of Jefferson County Public Schools, I am pleased to submit this management response to the Kentucky Auditor of Public Accounts' Special Examination of the Jefferson County Public School District. I want to express my sincere appreciation to Auditor Ball and the examination team for the thoroughness and professionalism of this review. A special examination of this scope, covering 14 chapters, hundreds of interviews, extensive data analysis, and site visits across the District, represents a significant investment by the Commonwealth in understanding one of its most complex and consequential public institutions. We receive this report in the spirit in which it was intended: as a tool for improvement.

I began serving as Superintendent of Jefferson County Public Schools on July 1, 2025, inheriting an institution in the midst of significant challenges, a \$188 million budget deficit, loss of community trust following transportation disruptions, staffing shortages, and a period of organizational instability that had affected the District's ability to focus on its core mission. Much of the activity examined in this report occurred prior to my arrival. That context does not diminish the findings, nor does it diminish the District's responsibility to address them.

I must recognize the dedicated men and women of Jefferson County Public Schools, the teachers, counselors, bus drivers, food service workers, administrators, support staff, and countless others who show up every day for nearly 96,000 students. This examination documents real and significant challenges. It also documents a workforce that cares deeply, that is working hard under difficult conditions.

The pages that follow provide the District's response to each of the 14 chapters of the examination report. For each chapter, we describe actions that are completed or meaningfully underway, note relevant context where appropriate, and identify areas where the District's path forward will be addressed in greater detail in the Corrective Action Plan.

I am grateful for the opportunity to respond and for the continued partnership of the Auditor's office as we work to build a stronger, more transparent, and more equitable school district for every child in Jefferson County.

Respectfully submitted,
Dr. H. Brian Yearwood
Superintendent
Jefferson County Public Schools

Jefferson County Public Schools, P.O. Box 34020, Louisville, KY 40232



Chapter 1: District Leadership and Strategy

Jefferson County Public Schools (JCPS) appreciates the examination team's thorough review of District leadership structures, strategic planning, and workplace culture. JCPS is the largest public school district in Kentucky and one that is more appropriately benchmarked against large urban districts nationally. The findings and observations in this chapter are consistent with priorities that Superintendent Yearwood identified upon entering the role and that have informed the District's organizational improvement work during the 2025-26 school year.

Actions completed or meaningfully underway include the following:

- Completed a comprehensive organizational review of executive leadership functions, reporting relationships, and division alignment during the 2025-26 school year
- Reduced chief-level positions from 13 to 7, significantly decreasing the number of direct reports to the Superintendent, effective July 1, 2026
- Eliminated the Chief of Staff role and redistributed functions, including student support, health, and culture and climate, to divisions with direct operational responsibility
- Established a new Chief of Strategy and Innovation role to consolidate strategic planning, organizational improvement, and innovation functions under unified leadership
- Initiated development of a new District strategic plan, which will align executive leadership responsibilities, organizational priorities, performance metrics, and resource allocation
- Made clear to District leadership and staff that a culture of open communication is a priority this administration and that any reported instances of retaliation will receive direct and immediate attention

Chapter 2: Jefferson County Board of Education

The Board of Education and District administration share a commitment to strong governance, transparency, and accountability in service of JCPS students and families. The District recognizes that many of the recommendations in this chapter reflect governance functions that rest primarily with the Board; the administration's role is to provide information, operational support, and transparent communication to facilitate effective Board oversight.

The District wishes to note the following responses to specific findings in this chapter.

Recommendation 2.1.a—Board Q&A Guidelines

No guidelines are needed regarding which questions should be made public and which should not. Because Board members are elected officials, the District and the Board as a body do not have authority to dictate how a Board member may ask questions (i.e., publicly or privately). All questions posed by Board members using the Board Q&A structure receive responses from District leadership. All responses are distributed to all Board members and posted to the Kentucky School Boards Association (KSBA) eMeeting Portal. The only time a response would not be made public is if the issue at hand pertains to a topic to be discussed in Executive Session. For questions a Board member does not wish to make public,



the Superintendent and Cabinet members are available to respond to queries made by individual Board members.

Finding 2.2—Board Meeting Facilitation and Time Use

The Board agenda is set by the Board Chair in collaboration with the Superintendent. District-led presentations and discussions, which are approved by the Board Chair in consultation with the Superintendent, are designed to inform Board members of important and strategic items affecting the district while allowing time for Board member questions that may not have been addressed during the presentation itself. By definition, these are high-impact agenda items. However, the auditor's finding conflicts with the limitations of SB 1, which greatly restricts the board's ability to delve into the details of the district's operations at anything more than a surface level, other than the budget.

Senate Bill 1 states, in pertinent part: (a) A local board of education shall: 1. Delegate authority to the superintendent over the district's day-to-day operations and implementation of the board-approved strategic plan and budget in a manner that promotes the efficient, timely operation of the district, including but not limited to the authority over contracts related to daily operations of the district, pupil transportation, personnel matters, and the organizational structure of administrative staff ...

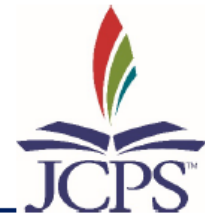
Recommendations 2.2.a and 2.2.b—Board Meeting Time Use and Student Presentations

The Board currently incorporates recognition of student achievement into its regular meeting agenda, and it takes note of the need to include live demonstrations of learning into the Board meeting. However, regular inclusion could conflict with the need for data-driven discussions of how to improve academic outcomes and exceed a two-hour limit on meetings. Board members can be mindful of the need to consistently engage with their school communities to witness learning in action.

Finding 2.3 and Recommendation 2.3.a—Consent Agenda

From a practical perspective, nearly any item on the Board agenda can impact the District's budget, whether directly through expenditures or through appropriate and efficient use of previously expended funds. Consent items, almost by definition, consist of informational items that the Board—and, by extension, the voting and taxpaying public—should be aware of, but which do not require lengthy or in-depth discussion. The APA report and SB 1 appear to move in opposite directions: while the Auditor recommends moving consent items to more public discussion, SB 1 would permit them to be removed from the Board agenda altogether, save whatever quarterly informational reports the superintendent determines to be necessary. Due to concerns regarding the lack of transparency SB 1 would permit, draft policies to implement SB 1 would require many items to remain on the Consent Calendar for the Board to review, not approve.

Both scenarios would significantly alter a piece of the Board meeting agenda that, by all accounts, works extremely well—informational items that can, at Board members' discretion, be discussed more fully while preserving the overall efficiency and transparency of agenda items. It would be helpful if the APA could distinguish particular budget-related items that should be regular agenda items rather than consent



agenda items. Furthermore, this conflicts with Finding 2.2, which aims to focus more of the Board's meeting time on "high-impact agenda items." The District's response to Finding 2.3 applies equally to Recommendation 2.3.a.

Observation 2.4—Stakeholder Perception of Board Governance

Members of the public have access to Board decision-making through access to Board materials typically more than one week in advance of Board meetings. Regular Board meetings are open to the public, live streamed, and archived on YouTube. Community members and stakeholders may speak for up to three minutes each about any topic at all regular Board meetings. Up to 90 minutes is allocated for public speakers at each meeting. For major decisions facing the Board, the Board frequently sponsors community forums and/or offers ways for community members and stakeholders to submit comments online. Community members may submit comments and concerns to Board members via email.

Notwithstanding the above, the District remains committed to strengthening Board governance and improving transparency for students, families, and the broader community. Actions completed or underway include the following:

- Strengthened processes for providing Board members with timely, complete information in advance of major decisions, including a structured Board Q&A process for documenting and publicly posting responses to member questions prior to scheduled meetings
- Expanded community engagement throughout the 2025-26 school year through public meetings, stakeholder forums, budget discussions, facilities and consolidation meetings, and multilingual communications
- Established districtwide priorities—"Every Student. Every Year."—anchored by commitments to Academic Excellence and Growth, Student Well-Being and Belonging, Opportunity and Access, and Strong Systems and Responsible Stewardship
- Initiated substantial work to establish a unified strategic direction through the development of a comprehensive strategic plan. This work includes defining district priorities, performance measures, accountability systems, and student outcome indicators that will serve as the foundation for future governance and oversight.

Regarding Board meeting structure and the consent agenda, the District notes that meeting agendas must also accommodate statutory requirements, policy obligations, budget approvals, personnel matters, and procurement actions. Any restructuring of meeting time will balance increased focus on student outcomes with these ongoing governance obligations. Board members retain the authority to remove any item from the consent agenda for individual discussion.

The superintendent evaluation process for Dr. Yearwood's first year was developed concurrently with organizational stabilization, financial recovery efforts, and strategic planning, circumstances that affected the development and communication of evaluation criteria and timelines. The Board is actively engaged in the evaluation process for the 2025-26 school year.



Board self-evaluation is a governance responsibility that rests with the Board. The District reaffirms its commitment to transparency and will continue to support the Board's governance improvement efforts.

Chapter 3: Internal Audit

JCPS is committed to maintaining a strong, independent internal audit program and to strengthening the governance structures that support it. Several meaningful actions are completed or actively underway.

Actions completed or meaningfully underway include the following:

- Assigned a Board member to attend ARMAC meetings beginning fall 2025, strengthening the connection between ARMAC deliberations and full Board awareness
- Developing standard operating procedures aligned with ARMAC charter requirements to formalize committee operations and member responsibilities
- Establishing a post-meeting communication log to be circulated to appropriate stakeholders following each ARMAC meeting, ensuring relevant discussions and formal recommendations reach the right parties in a timely manner
- Committed to twice-annual ARMAC updates to the full Board in October and May, aligned with key points in the District's governance calendar
- Establishing a formal member recommendation process, including completion of a candidate independence and disclosure form, submission of recommendations to the Superintendent, and documented concurrence by the Board and Superintendent
- Developing a membership tracking process and template to monitor compliance with charter requirements and make term status visible to the Board
- Granted the Director of Internal Audit direct access to the Board Q&A document, enabling transparent, unfiltered visibility into how Internal Audit responses are communicated to Board members
- Continued usage and enhancement of the Quarterly Activity Report to include additional detail on findings and recommendations, building on the reporting framework established in FY25
- Issued the first Internal Audit Summary Annual Engagement Follow-Up Report in September 2025 and will continue issuing this report annually to the Superintendent, Board, ARMAC, and relevant District leadership

Regarding the Internal Audit Director's performance evaluation structure, the District acknowledges this as an important governance matter and is committed to working collaboratively with the Board and ARMAC to clearly define evaluation roles and responsibilities in a manner that appropriately reflects and protects the independence of the internal audit function.



Chapter 4: Finance

JCPS acknowledges the significance of the findings in this chapter and recognizes that strengthening procurement practices, financial transparency, and investment accountability are among the most critical priorities for the District's long-term health. Several foundational actions have been completed or are actively underway.

Actions completed or meaningfully underway include the following:

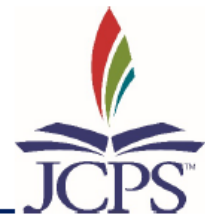
- Revised Board Policy 04.1 (December 2025) to require Board notification when new expenses are added beyond the Working Budget, strengthening transparency between District administration and the Board on fiscal matters
- Revised Administrative Procedure 04.32 AP.11 (November 2025) to clarify the acceptable conditions for noncompetitive negotiations in alignment with KRS 45A.380, directly addressing documented gaps in sole source procurement documentation and due diligence
- Approved the FY27 Tentative Budget (May 2026) reflecting a \$115 million reduction in prior year expenses, including \$80 million in recurring expenditure reductions and \$35 million directed toward deferred maintenance needs
- Engaged EUNA contract management software to establish a centralized digital repository for all purchasing documentation, contracts, and procurement workflow approvals
- Developed a Contract Services and Agreements Workflow in collaboration with General Counsel, Internal Audit, and Finance to improve procedural compliance and communication across contracting functions, to be finalized July 2026
- Developed a public-facing General Fund Budget-to-Actuals Dashboard in collaboration with ARSI and Finance, going live July 2026, providing monthly updates allowing stakeholders to analyze spending by school, department, expense type, and account
- Developed an investment tracking system that distinguishes operational expenditures from strategic investments, along with foundational components of an ROI framework, including proposal review criteria, KPI identification processes, and a tiered evaluation framework, to support more rigorous and transparent investment decision-making

Chapter 5: Human Resources

JCPS recognizes the critical role that staffing, compensation, hiring practices, and employee development play in the District's ability to serve students effectively. The findings in this chapter reflect challenges that are shared across many large urban districts and that the current administration is actively working to address.

Actions completed or meaningfully underway include the following:

- Completed a comprehensive compensation analysis of positions on the IA and IB salary schedules and Job Family II 4-7, finding the vast majority to be below market relative to peer districts; salary schedule changes reflecting market-aligned wage increases for classified staff, including instructional assistants, clerical staff, and trades workers, will be presented to the Board at the June 30, 2026, Board meeting



- Modified the certified hiring process in collaboration with JCTA (January–February 2025) to allow external candidates to be considered alongside internal transfer candidates during the transfer window, reducing certified vacancies by approximately half compared to the prior year
- Developed and is implementing a Recruitment Strategic Plan for 2025-26, including targeted efforts to reduce teacher vacancies, to be continued and updated through 2026-27
- Reviewed and revised zone-based staffing assignments to improve consistency of HR service delivery and support for school-based hiring managers
- Initiated a comprehensive job description review process under the Director of Compensation and Classification to ensure position classifications reflect current roles and responsibilities
- Implementing a comprehensive electronic performance management system during the 2026-27 school year to replace the District's largely paper-based evaluation process for approximately 18,000 employees
- Begun analysis of administrator compensation under the Director of Compensation and Classification to assess alignment with market benchmarks

Chapter 6: Operations and Technology

The District acknowledges the observations and recommendations in this chapter. With respect to technology, JCPS has undertaken meaningful structural and operational improvements over the past year.

Actions completed or meaningfully underway include the following:

- Completed a major restructuring of the Technology Division in January 2025, adding dedicated capacity in cybersecurity and better aligning the Division's structure with District operational needs
- Awarded a three-year, approximately \$4 million federal cybersecurity grant from the FCC to fund systems, services, and staffing to protect student and staff data, financial systems, and instructional resources
- Submitted an updated District Technology Plan for 2026-27 reflecting current organizational structure changes and the District's evolving technology strategy
- Established a formal Change Advisory Board (CAB) within the Technology Division to ensure that all system changes are properly vetted and governed before implementation
- Actively managing the Chromebook repair-and-replacement challenge within current budget constraints, with replacement funding built into long-term budget planning; the District has sufficient devices to maintain 1:1 student access in the near term while a sustainable funding model is developed
- Progressing toward a Districtwide data governance framework, with plans to formalize policies, procedures, and roles across divisions, recognizing that effective data governance must extend beyond any single division to encompass Districtwide systems and data stewardship



Chapter 7: Bus Safety

JCPS acknowledges the findings in this chapter and recognizes the significance of the transportation challenges that emerged during the examination period, most notably the disruptions experienced on the first day of the 2023-24 school year. The District contracted with Prismatic Services to conduct an independent, comprehensive assessment of both the August 9, 2023, incident and the broader transportation program and has been actively working through the recommendations identified in both phases of that review.

Actions completed or meaningfully underway include the following:

- Substantially increased bus driver compensation beginning in the 2024-25 school year, including significant hourly salary schedule increases, a new CDL-based hiring incentive of up to \$4,000, a challenging run stipend, and longevity pay for long-tenured drivers
- Assigned Culture and Climate staff to each bus compound to support behavior data collection, driver training, and real-time consultation on bus referrals
- Expanded resources in the *Student Support and Behavior Intervention Handbook* to include updated expectations and procedures for bus discipline, distributed through the JCPS website and communication channels
- Implemented bimonthly driver feedback surveys and opening scrimmage surveys to gather transportation staff input on operational concerns and first-day preparedness

The District is committed to continued improvement in bus safety, driver recruitment and retention, and the consistent application of student conduct policies on school buses. Additional corrective actions will be detailed in the formal Corrective Action Plan.

Chapter 8: Student Supports, Culture and Climate

JCPS is committed to ensuring that every student has access to the supports, safety, and learning environment they need to thrive. This chapter spans a broad range of District functions and reflects both areas of genuine strength and areas where continued improvement is warranted.

The District wishes to note the following responses to specific findings in this chapter.

Observation 8.5—School-Based Decision Making Council Parent Participation

While parent involvement is an important component of effective School-Based Decision Making (SBDM) Councils and is strongly encouraged, it is not a legal requirement for establishing quorum. A council may legally conduct business and hold a meeting as long as a quorum of council members is present, in accordance with statutory requirements.

Additionally, there is no legal requirement that meeting minutes or agendas identify the role group of every individual in attendance. However, doing so is considered a best practice and is included in the sample agenda and meeting templates that are provided to principals each month. We encourage schools to follow this practice to promote transparency and consistency in documentation.



Regarding the statement that JCPS should ensure that schools meet all parent involvement guidelines, the District emphasizes that it currently has processes in place to support compliance. When a school has a parent vacancy on its council, the Diversity, Equity, and Poverty Division works directly with the principal to facilitate the election process and assist parent groups in filling those vacancies. We actively support schools in maintaining appropriately constituted councils and encourage meaningful parent participation throughout the process.

Observation 8.9—Tracking Effectiveness of Interventions and Supports Across Demographic Groups

In Student Support Services, the District specifically tracks demographic information for the supports provided by Community Supports. Robust data collection is used to report outcomes for students served in the Community Supports Department, including tracking the effectiveness of individual interventions across demographic groups. Supporting data is maintained and available for review.

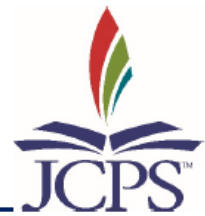
Notwithstanding the above, the District remains committed to ensuring that every student has access to the supports, safety, and learning environment they need to thrive. Actions completed or meaningfully underway include the following:

- Achieved a five-percentage point reduction in the District’s chronic absenteeism rate in 2024-25, supported by a multi-pronged strategy including over 4.5 million attendance-related text messages to families, targeted home visits, removal of attendance barriers, and expanded truancy and re-engagement partnerships
- Implemented Board Cell Phone Policy 09.4261 districtwide beginning in the 2025-26 school year, with 90 percent of school-based staff reporting smooth implementation; the District is monitoring stakeholder perceptions and early outcome data, including a notable increase in library book checkouts in the policy’s first month.
- Strengthened the tutoring vendor contracting and oversight process in fall 2025, including the addition of ROI language, program effectiveness criteria, and financial approval requirements prior to legal review
- Maintained strong student-to-counselor ratios that exceed the nationally recommended 1:250 benchmark, with each school’s receiving at least one counselor and one mental health practitioner; student survey data shows nearly 90 percent of high school students report access to necessary mental health resources.

These are areas that require sustained attention, and the District will address specific corrective actions in the formal Corrective Action Plan.

Chapter 9: Curriculum and Instruction

JCPS is committed to ensuring that every student receives high-quality instruction delivered through evidence-based materials in a rigorous and engaging learning environment. The District acknowledges the observations in this chapter, including areas where classroom instruction and division collaboration require continued strengthening.



Actions completed or meaningfully underway include the following:

- Completed the districtwide rollout of High-Quality Instructional Resources across all grade bands and core subject areas through the 2025-26 school year, providing teachers with a consistent, standards-aligned curriculum framework
- Merging the Academics and Schools Divisions into a unified structure under a Chief Academic Officer effective July 1, 2026, directly addressing the coordination and collaboration gaps identified in this chapter and aligning JCPS more closely with peer district organizational models
- Established Superintendent Yearwood's academic priorities, centered on individual student growth in ELA and Math with a target of three percent improvement in both proficiency and growth rates, as the driving framework for the 2025-26 school year
- Launched the "Every Student. Every Year." campaign articulating the District's commitment to at least one year of academic growth for every student annually

The District acknowledges the classroom instruction findings from the exam team's school visits, including areas of concern related to differentiated instruction, student engagement, and academic discourse. These observations will inform professional development priorities and coaching strategies. Additional corrective actions will be addressed in the formal Corrective Action Plan.

Chapter 10: Assessments, Accountability and Systems Improvement

JCPS acknowledges the findings in this chapter, including the District's sustained decline in NAEP proficiency rates since the COVID-19 pandemic and the significant concentration of schools rated red or orange under the Kentucky Accountability System. These findings reflect real challenges that require strategic and sustained action, and the District is committed to that work.

The District notes that instructional decisions, resource allocation, and school improvement strategies are informed primarily by the comprehensive state and District assessment system, including KSA results, ACCESS, MAP, and CERT, which provide school-level and student-level data that NAEP's sample-based design cannot. NAEP remains a valuable national benchmark, and the District will ensure its data informs district-level planning discussions in a more deliberate and documented way going forward.

Actions completed or meaningfully underway include the following:

- Eliminated the Assistant Director of ARSI position focused on Goals and Guardrails tracking, effective June 30, 2026, in alignment with the District's transition to a new strategic planning framework
- Continued implementation of the Comprehensive District Improvement Planning process, through which JCPS annually conducts needs assessments, subgroup performance analyses, measurable goal setting, and targeted improvement strategy development in alignment with KDE requirements
- Restructured the Enhanced Support Zone to include More Rigorous Intervention schools and Choice Zone schools, providing more focused and differentiated central office support to the District's highest-need schools



- Initiated a redesign of the District's school improvement framework beginning in April 2026, in collaboration with the Academics Division, with a focus on clarity, simplicity, and proportionate support structures, directly responsive to the finding that the current model is unnecessarily complex

The District recognizes that the accountability data in this chapter reflects the urgency of the work ahead. Establishing clear, multi-year student outcome goals aligned to the Kentucky Accountability System will be a central priority of the District's forthcoming strategic plan.

Chapter 11: Diversity, Equity, and Poverty

JCPS is committed to ensuring equitable access, opportunities, and outcomes for every student, with particular attention to student groups who have historically experienced persistent gaps. The District acknowledges the findings in this chapter related to achievement gaps and the clarity and alignment of the District's racial equity planning structures.

The District wishes to note the following responses to specific findings in this chapter.

Finding 11.1—Federal Guidance Compliance and Racial Equity Analysis Protocol

As the District has maintained in every situation referenced in the audit, the District is actively complying with federal and state guidance and will continue doing so. In response to the United States Department of Education's (USED) "Dear Colleague" letter and certification requirement, the District offered documentation that it submits every year verifying its compliance with state and federal laws. By not submitting the later-invalidated certification, JCPS was not indicating a lack of compliance with federal law. Rather, the District was offering assurance that it was following established law and providing documentary evidence that these assurances were made prior to USED's required certification. Starting in June 2025, the District engaged in conversations with the Office for Civil Rights (OCR) to ensure that the District complies with federal guidance. As stated to OCR, the District routinely reviews and revises any policies that need to be updated to comply with any changes to state and federal law. While OCR took issue with the District's policies, specifically its use of the Racial Equity Analysis Protocol (REAP), the District explained that the purpose of the REAP is to ensure compliance with Title VI as opposed to OCR's characterization of the REAP as being a means to offer preferential treatment to groups based on a protected characteristic. The REAP is a mechanism to hold the District accountable to the requirements of Title VI and ensure that students of all races, colors, and national origins receive the same access to the benefits of a high-quality education without discrimination. To be clear, the REAP analysis is applied equally to all District and school-level policy and practice decisions, and the questioning is focused on ensuring that all students are treated equitably. Further, the REAP is one part of the process by which staff can engage in an intentional and rigorous discussion regarding the impacts of adult policy choices on students and is directly linked to compliance with federal law.

An example of the District's proactive efforts in ensuring ongoing compliance occurred in July 2025 through discussions with OCR. Since OCR believed the REAP violated Title VI, the District reviewed, identified, and revised several policies to make it abundantly clear that the District complies with all federal laws. As stated to OCR, the District included some variation of the following language in six policies:



The District shall comply with all applicable provisions of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; the Individuals with Disabilities Education Act of 1990; Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; and the Age Discrimination Act of 1975.

On October 14, 2025, the Board approved amendments to four policies to clarify that the District “shall promote equal opportunities through a vigorous set of policies and practices designed to ensure that all qualified candidates have access to opportunities for employment, and that all employees receive support for professional growth advancement, and equitable treatment.” While most policy amendments are approved subsequent to the conclusion of the Regular Session of the Kentucky General Assembly and prior to the August 15 statutory deadline based on legislation that has passed, the Board approves other policies throughout the year on an as-needed basis.

The Kentucky Department of Education’s 2020 Jefferson County Management Audit Report found that “[s]chool interviews suggested that school policies and procedures are reviewed annually and that SBDM Members are given the opportunity to provide feedback on new and existing policies. Many SBDM Members indicated that the REAP tool was used when amending or developing policies.” The District is committed to maintaining compliance with federal guidance and laws.

As noted, federal laws are rapidly evolving, especially in the education landscape. JCPS’s General Counsel office, composed of executive administrators who focus on policy changes and six attorneys, continues to monitor those changes and recommend modifications to JCPS policies or procedures as necessary. Monitoring efforts include, but are not limited to, reviews of federal policy guidance and federal legislation, membership in education law groups which provide additional information and insight regarding changes to federal laws, and continued attendance at continuing legal education opportunities related to evolving federal laws.

Finding 11.5—District Racial Equity Plan Actionability and Progress Measures

The Racial Equity Plan Logic Model, as does the internal Racial Equity Plan Activity Tracking Sheet, includes supporting and direct activities and progress measures. The Racial Equity Plan Activity Tracking sheet includes some documentation that encompasses student information/data to which the general public should not have access. For this reason, the internal tracking sheet is not made public or forward facing. In addition, each Central Office department determined activities and progress monitoring mechanisms for each supporting activity, which extends to the direct activities within the Racial Equity Plan.

Finding 11.6—Racial Equity Policy and Plan Scope

As outlined under Findings within the Racial Equity Policy, the Board acknowledges persistent gaps in academic achievement, attendance, learning, expectations, opportunities and access, sense of belonging, and disciplinary outcomes among student groups based on race and ethnicity. The Board recognizes that Students of Color (i.e., students who have a racial identity other than White) have been disadvantaged by long-standing inequities in our society, the causes of which are multi-faceted and reflect historical, social, and institutional factors. The Board believes that as a diverse urban school district whose student



population is mostly Students of Color, the District must take a systemic approach to ensure that students have equitable learning opportunities, experiences, and outcomes.

The racial equity policy acknowledges that certain student groups have been historically marginalized because of race and seeks to address those inequities through intentional action. However, the policy does not limit the district's work to race alone; it provides a framework for examining how policies, practices, and decisions affect all students. JCPS continues to implement targeted supports for a wide range of student populations, including students receiving Exceptional Child Education (ECE) services, Multilingual Learners (ML), students experiencing homelessness under the McKinney-Vento Act, and others with unique needs. The district's strategic plans, procedures, and resource allocations are designed to remove barriers and improve outcomes wherever disparities exist. In this way, racial equity serves as one important lens within a broader commitment to ensuring every student has access to the support and opportunities they need to succeed.

Finding 11.7—School Racial Equity Plans: Rigor and Accountability

As outlined in the Racial Equity Policy under Progress Monitoring Structure and in the Racial Equity Plan Meeting Structure and Monitoring Protocol, progress updates for School Racial Equity Plans are submitted four times a year. Goals in the School Racial Equity Plan include measurable student outcomes. Principal supervisors meet with a representative from Opportunity and Access bimonthly to review school progress updates to ensure that the evidence aligns with stated goals and activities, including data that speaks to progress toward the stated goal(s). Follow-up communication is sent to school administration after bimonthly meetings to provide feedback and to ascertain progress, if data was not provided in the update. Furthermore, principal supervisors go over school racial equity goals during their formative system review (FSR), as an accountability measure.

Finding 11.8—School Racial Equity Plans: Burden and Disconnection

School Racial Equity Plan goal(s) have a direct connection to the Racial Equity Policy, as well as to racial equity professional growth goal(s), which are a part of every certified employee's professional growth plan. In addition, the goal-setting process is similar to that of a Comprehensive School Improvement Plan (CSIP), in which the goal(s) should be specific, measurable, and attainable; including progress monitoring mechanisms and activities to reach the goal(s) that are set.

Finding 11.9—Connection Between District and School Racial Equity Plans

School Racial Equity Plans are a derivative of the Equity Monitoring Progress Tool (EMPT), as well as the District Racial Equity Plan, which were both developed to address the dictates of the Racial Equity Policy Directives (Tenets): Diversity in Curriculum, Instruction, and Assessment; School Culture and Climate; Programmatic Access; Staffing and Classroom Diversity; Evaluating Board Policy; and Administrative Procedures.

JCPS has renamed the Division to Opportunity and Access to better reflect its commitment to ensuring that every student has the support and opportunities needed to succeed. This change represents a pivot of the work, not a departure from it. The District is looking to strengthen the alignment of equity efforts across all departments, championed by this department so that responsibility for student success is shared



collectively rather than housed within a single office. JCPS is continuing to create a more cohesive and sustainable approach to serving students. This collective framework will further strengthen the district's ability to identify barriers, expand access, and improve outcomes for all students.

Notwithstanding the above, the District remains committed to ensuring equitable access, opportunities, and outcomes for every student. Actions completed or meaningfully underway include the following:

- Renamed the Diversity, Equity, and Poverty Division to the Opportunity and Access Division as part of the broader central office reorganization, reflecting the District's commitment to ensuring shared, districtwide responsibility for removing barriers and expanding opportunity for all students
- Continued implementation of school-level Racial Equity Plans with quarterly progress updates, bimonthly review meetings between principal supervisors and Opportunity and Access staff, and follow-up communication to school administrators on progress toward stated goals

The District will address additional corrective actions in the formal Corrective Action Plan.

Chapter 12: Exceptional Children Education

JCPS is committed to ensuring that every student with a disability receives the high-quality, legally compliant services they are entitled to under federal and state law. The District acknowledges the findings in this chapter, which reflect both areas of strong infrastructure and areas requiring continued improvement in identification practices, least restrictive environment, academic outcomes, and discipline equity.

Actions completed or meaningfully underway include the following:

- Approved a reorganization of the Exceptional Child Education (ECE) Department on March 31, 2026, creating a streamlined structure under a new Executive Officer of ECE, with clearer lines of accountability and reduced administrative layers
- Resolved four of five state-issued Corrective Action Plans from KDE, with active, documented progress on the remaining plan
- Deploying 15 percent of federal IDEA funds through a Comprehensive Coordinated Early Intervening Services (CCEIS) plan across 24 targeted schools to address significant disproportionality in the disciplinary treatment of Black students with disabilities, a longstanding area of concern identified through KDE's annual determinations
- Expanding the multi-school co-teaching professional learning cohort to improve inclusive service delivery and increase the percentage of students with IEPs educated in general education settings, supported by new Least Restrictive Environment (LRE) training modules and scheduling guidance
- Formalized collaboration between the ECE Department and the Office of Multilingual Learners to address the identification and IEP development needs of multilingual students with disabilities, including deployment of referral guidance, assessment tools, and cross-departmental protocols
- Continued use of an equity index to monitor gifted and talented identification across demographic groups, with data-informed outreach to improve equitable representation in gifted programming



The District recognizes that students with disabilities and gifted learners deserve unwavering commitment to both compliance and excellence. Additional corrective actions across all areas of this chapter will be detailed in the formal Corrective Action Plan.

Chapter 13: Multilingual Resources and Supports

JCPS serves a rapidly growing multilingual learner (ML) population, and the District is committed to ensuring these students receive the English language development (ELD) services, rigorous academic instruction, and family engagement supports they need to succeed. The District acknowledges the findings in this chapter, including the need for a more actionable district-level plan and continued progress on educator capacity and achievement gaps. It is important to note that multilingual learners face the dual challenge of simultaneously developing English proficiency while mastering grade-level academic content, a reality that shapes the District's approach and the benchmarks by which progress is measured.

Actions completed or meaningfully underway include the following:

- Implemented a common curricular resource for all English Language Development courses for the first time, reducing instructional variance and creating greater coherence in ELD delivery across schools
- Established a 60:1 student-to-ELD teacher staffing allocation model—the first formal ELD staffing formula in District history—resulting in the addition of more than 150 ELD teaching positions across the District over the past several years
- Established a High-Density School designation to provide differentiated support to schools serving the largest concentrations of multilingual learners, including structured principal, ML lead, and ML counselor collaborative meetings
- Expanded professional learning beyond ELD teachers to all educator role groups, building shared responsibility for multilingual learner success across teachers, administrators, counselors, instructional coaches, and support staff
- Developed cross-departmental guidance and referral resources with the ECE Department to support equitable and appropriate evaluation of multilingual learners for special education services, including tools to distinguish language acquisition needs from disability-related factors
- Provided ongoing advocacy to KDE regarding assessment and accountability structures that more accurately reflect multilingual learners' language development trajectories and academic growth

The District's forthcoming strategic plan will include specific goals and accountability measures for multilingual learner outcomes. Additional corrective actions will be addressed in the formal Corrective Action Plan.

Chapter 14: College and Career Readiness

JCPS is committed to ensuring that every student graduates prepared for postsecondary success, whether through college, career, or both. The District acknowledges the findings in this chapter related to

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VAN HOOSE EDUCATION CENTER
3332 NEWBURG ROAD
LOUISVILLE, KY 40218



partnership coordination, persistent postsecondary readiness gaps for several student subgroups, and graduation rate declines for Hispanic/Latino students and English Learners.

Actions completed or meaningfully underway include the following:

- Launched the Academies of Louisville Alliance in late 2023, in partnership with KentuckianaWorks and Greater Louisville Inc., which has added dedicated external capacity to expand and sustain this work.

Specific corrective actions for partnership coordination, subgroup postsecondary readiness, and graduation equity will be detailed in the formal Corrective Action Plan.