

Kentucky's Early Childhood Regional Training Centers

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Foreword

In October 2024, the Education Assessment and Accountability Review Subcommittee (EAARS) approved the Office of Education Accountability's (OEA) 2025 study agenda, which included an evaluation of early childhood regional training centers (RTCs). This report describes state and federal policies that apply to the RTCs and analyzes funding, expenditures patterns, and student populations served by each of Kentucky's five RTCs.

The Office of Education Accountability would like to thank staff at the Kentucky Department of Education for their assistance with this report, with particular appreciation for Melody Cooper of the Office of Special Education and Early Learning.

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Summary

Kentucky's five early childhood Regional Training Centers (RTCs), required by KRS 157.318 since 1990, provide training, technical assistance, and resources to support preschool personnel serving children with disabilities and those at risk. Operated by four school districts and one educational cooperative, RTCs are funded entirely through federal Individuals with Disabilities Education Act (IDEA), Part B, preschool set-aside funds. In FY 2024, the Kentucky Department of Education (KDE) allocated approximately \$2.26 million of these funds to RTCs.

This study, requested by the Education Assessment and Accountability Review Subcommittee in 2024, examined RTC funding, operations, populations served, and alignment with state and federal requirements. Data were drawn from KDE contracts, financial and staffing reports, enrollment data, and staff interviews.

RTCs are the primary mechanism for providing no-cost professional development and support to preschool personnel statewide. In 2024, training and support addressed behavioral interventions, inclusive instructional practices, compliance with IDEA requirements, and transition to kindergarten. While children with disabilities represent the primary target population (39% of preschool enrollment), many services also benefit at-risk and other preschool students.

The report identifies a number of issues that merit increased attention from KDE. Significant disparities exist in funding distribution. For example, per-student allocations in 2024 ranged from \$117 in Anderson County to \$427 in Ashland. OEA summary review of RTC contracts and expenditures identified a number of concerns suggesting the need for additional oversight by KDE. These concerns included inconsistent expenditure coding, potential mingling of district and RTC resources, and limitations in the data reported by RTCs related to contractual goals for program participation and impact.

RTCs employ small staffs—typically one director and one or two consultants. While expenditures on salaries and benefits average 62 percent and are the majority of expenditures in all RTCs, spending in other categories varies substantially, suggesting differences in services and materials available across regions.

The study concludes that while RTCs provide valuable training and resources, greater oversight by KDE is necessary to maximize equity, fiscal accountability, and program effectiveness. In addition, given advances in technology and alternative service delivery models since RTCs were established, KDE should evaluate whether the current five-center structure remains the most efficient method for statewide support of staff who support preschool students with disabilities and those who are at risk. Because KRS 158.318 requires that KDE use federal funding to support these centers, statutory changes would be necessary to permit alternative use of federal funds.

The report includes the following recommendations:

Recommendation 1:

The Kentucky Department of Education should review Regional Training Centers' district service areas and allocation of grant funding to ensure equitable access to Regional Training Center resources and services by participating districts.

Recommendation 2:

The Kentucky Department of Education should ensure that Regional Training Centers apply correct and uniform coding practices for both expenditures and staffing classifications. For example, the Kentucky Department of Education should require that Regional Training Center financial accounts be established as agency funds rather than district funds.

Recommendation 3:

The Kentucky Department of Education should review Regional Training Center budgets and expenditures to ensure they are consistent with contractual requirements and state guidelines. These requirements include, but are not limited to, indirect and direct cost rates and exclusive use of Regional Training Centers' grant funding to support Regional Training Center activities.

Recommendation 4:

The Kentucky Department of Education should conduct an evaluation of the current structure of the Early Childhood Regional Training Centers to assess whether the existing model effectively and efficiently delivers support services to school districts. This evaluation should include a cost comparison between the current regional model and an alternative model in which staff are employed directly by the Kentucky Department of Education.

Findings should be shared with the Education Assessment and Accountability Review Subcommittee and the Interim Joint Committee on Education. Based on findings of the report, the General Assembly may wish to consider amending or removing requirements of KRS 157.318 related to early childhood regional training centers.

Introduction And Overview

Kentucky has five early childhood regional training centers (RTCs). Since 1990, the RTCs have been required by KRS 157.318.

Kentucky's five early childhood regional training centers (RTCs) provide a range of services to support personnel from local school districts and other agencies operating programs for preschool-aged children with disabilities or at-risk. The centers have been required by KRS 157.318 since 1990. They are part of the Office of Special Education and Early Learning (OSEEL) network of technical assistance providers within the Kentucky Department of Education (KDE). This study analyzes RTC funding; student and teacher populations served; and operations relative to state and federal requirements.

Description Of This Study

EAARS requested that OEA examine RTC funding, student populations served by RTCs, and federal and state policies related to the RTCs.

In November 2024, the Education Assessment and Accountability Review Subcommittee requested that the Office of Education Accountability (OEA) study the Early Childhood Regional Training Centers. The subcommittee requested that the study include an examination of federal funding and any state appropriations used in the allocation of funds. It further requested a review of populations served by each RTC and a review of state-enacted policy related to federal program requirements.

The report analyses student, staffing, and financial data from the Kentucky Department of Education (KDE). It also reviews RTC contracts and quarterly financial reports.

Data Used For The Report

Data used for this report came primarily from KDE, including:

- RTC contracts, supporting documents, and quarterly financial reports;
- student enrollment and preschool funding;
- district Annual Financial Reports;
- Professional Staffing Data (PSD) and Classified Staffing Data (CSD);
- LEAD data on teacher certification; and
- interviews with KDE program staff for preschool services.

Major Findings

- RTCs are the primary mechanism by which no-cost training and support is available for preschool personnel across the commonwealth. RTCs are funded entirely with state set-aside funds of preschool grants from federal IDEA B funds. In fiscal year (FY) 2024, KDE reserved about \$2.3 million in state set-aside funds, of which it allocated the overwhelming majority (2.26 million) to support RTCs.

- In compliance with 20 U.S Code § 1419, the federal law governing IDEA B preschool grants, RTC's contracted goals for 2024 were in support of goals outlined in the State Performance Plan to improve outcomes for children with disabilities aged 3 through 5. In recent years, KDE has increased the specificity required in RTC contracts related to RTC goals and supporting data.
- In 2023-2024, children with disabilities comprised about 39 percent and at-risk students comprised about 29 percent of children enrolled in the district-operated preschools. While the RTCs focus on resources to assist personnel in supporting children with disabilities, much of the training and support is relevant for at-risk and other preschool children. For example, training and support in 2024 focused largely on behavioral strategies and interventions. These are critical in assisting with the social and emotional development of children with disabilities while also benefiting at-risk and other preschool children.
- Funding distributed by KDE to each RTC is not proportional to the number of students with disabilities or at-risk students attending preschool in each RTC region; relative to the students enrolled in each region, one RTC received more than 3 times as much funding per student as another.
- OEA's summary analysis of RTC program documentation and data suggests that increased oversight by KDE is necessary to maximize RTC's fiscal and contractual accountability. Staff identified concerns related to overhead costs; compliance with contractual timelines; accurate and consistent coding; and evaluation of contractual objectives.
- Options available in regional service delivery models have increased in the 35 years since KRS 157.318 was enacted. KDE should examine the current model—which has five separate centers, each with one director and at least one consultant—to determine whether it is the most efficient and effective means of

providing support. Should KDE wish to use IDEA B set-aside funds to support preschool personnel through means other than RTCs, amendments to KRS 157.318 would be necessary.

State And Federal Program Requirements

Enacted in 1990, KRS 157.318 established a statewide network of regional training centers to provide training, consultation, and instructional resources for preschool staff working with children with disabilities or at risk. The law requires the centers to use federal funds for children with disabilities aged 3 through 5 and permits additional support through state appropriations, grants, or gifts.

RTCs are governed by KRS 157.318 and by federal program requirements for preschool grants from the Individuals With Disabilities Education Act, Part B, (IDEA B).

KRS 157.318

Kentucky Revised Statute 157.318, which was originally enacted in 1990:

- established a network of regional training centers to provide “peer-to-peer training, consultation, technical assistance, and materials to personnel from local school districts and other agencies operating programs for disabled and at-risk preschool children”;
- required the centers to receive federal funds available for children aged 3 through 5 with disabilities;
- permitted the centers to receive state appropriations, gifts, and grants; and
- required the Kentucky Board of Education (KBE) to promulgate any regulations necessary to administer the program.

See Appendix A for KRS 157.318 in its entirety.

KRS 157.318 was passed in the same year as the Kentucky Education Reform Act (KERA). KERA included requirements for school districts to provide educational services for preschool children who were economically disadvantaged or had an identified disability. Public record providing any additional context for KRS 157.318 no longer exists.^a

KBE has not promulgated regulations to administer the RTC. Because KDE has included RTCs in its applications for IDEA B preschool grant funding, the centers are governed by program requirements of these funds.

^a The statute references Public Law 99-457, a federal law passed in 1986, that extended existing federal requirements that children with disabilities be provided a free, appropriate public education (FAPE) to include children aged 3 through 5. That law was later incorporated as Part B of the Individuals with Disabilities Education Act (IDEA) of 1990.

IDEA B Preschool Grant Funding Requirements

RTCs are under direction of and direct supervision by KDE in compliance with federal requirements.

Federal requirements associated with funds that support the RTCs permit a variety of uses, including direct services to children with disabilities or support of personnel to meet the state's goals for students with disabilities aged 3 through 5.

20 U.S Code § 1419. Requirements for allocations of IDEA B preschool grants for children aged 3 through 5 are outlined in 20 U.S Code § 1419. That code specifies the portion of grant funds that that must be set aside to support state-level activities. Permitted use of these state-level activities include direct services to eligible children and state or local activities to meet performance goals established by the state under the State Performance Plan (SPP). The SPP, which is submitted by KDE to the US Department of Education, includes specific goals for children with disabilities aged 3 through 5.

RTC Districts And Populations Served

KDE contracts with the Anderson, Ashland Independent, Calloway and Simpson County Boards of Education and the Kentucky Valley Educational Cooperative to provide RTC services to districts across the state.

KDE contracts with four local school districts and one educational cooperative to operate RTCs. The school districts are Anderson County Board of Education, Ashland Independent Board of Education, Calloway County Board of Education, and Simpson County Board of Education. In addition, KDE contracts with the Kentucky Valley Educational Cooperative (KVEC)^b

Districts Served

Table 1.1 shows the number of districts served by each RTC. These range from a low of 27 districts in the Calloway RTC (16 percent of districts) to a high of 42 in the Anderson RTC (25 percent). Appendix B lists the districts in each RTC.

^b KVEC currently has the contract that was previously with Berea Independent.

Table 1.1
School Districts Served By RTC
SY 2024

Reginal Training Center	Count Of Districts	Percent Of All Districts
Anderson*	42	25%
Ashland	35	20
Calloway	27	16
KVEC*	36	21
Simpson	31	18

*Anderson RTC also serves the Kentucky School for the Deaf and KVEC services the Kentucky School for the Blind.

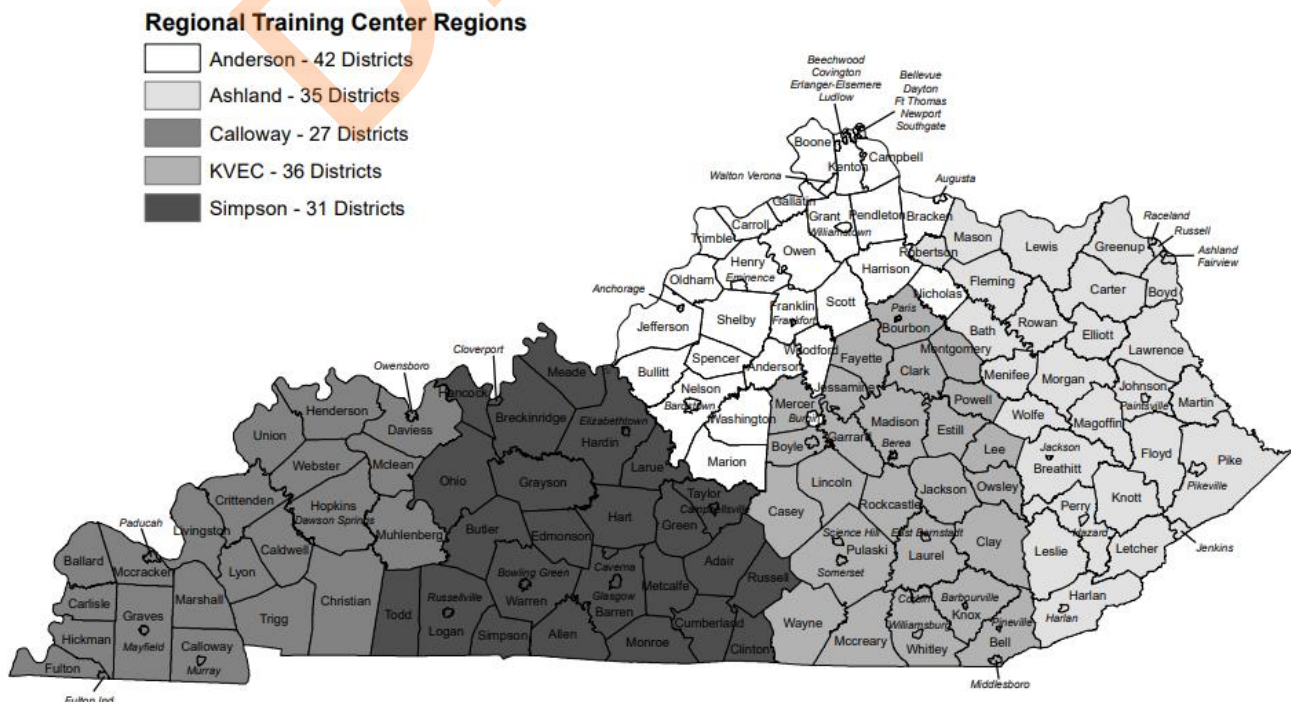
Source: Staff analysis of data from the Kentucky Department of Education.

The number of districts served varies substantially among RTCs. Anderson RTC serves 42 districts while Calloway RTC serves only 27 districts.

Anderson RTC serves a disproportionately high number of districts relative to the other RTCs. One of the districts served by Anderson RTC is Jefferson County Public Schools, which serves more preschool students than any other district.

Figure 1.A shows a geographic map of districts served by each RTC.

Figure 1.A
Districts by RTC Region



Children qualify for state-funded preschool if they are four years old and live in a household with an income up to 160 percent of the federal poverty level or if they are identified with a disability at age three or four.

Students Served

Districts receive funding for preschool students based on numbers of students who have been identified with a disability, beginning at age 3, and students who are considered to be at risk due to economic disadvantage, beginning at age 4. Students are considered economically disadvantaged if they live in a household with an income up to 160 percent of the federal poverty level. Space permitting, districts may enroll students in preschool who are not eligible according to these categories, but districts do not receive state funding for these students.^c

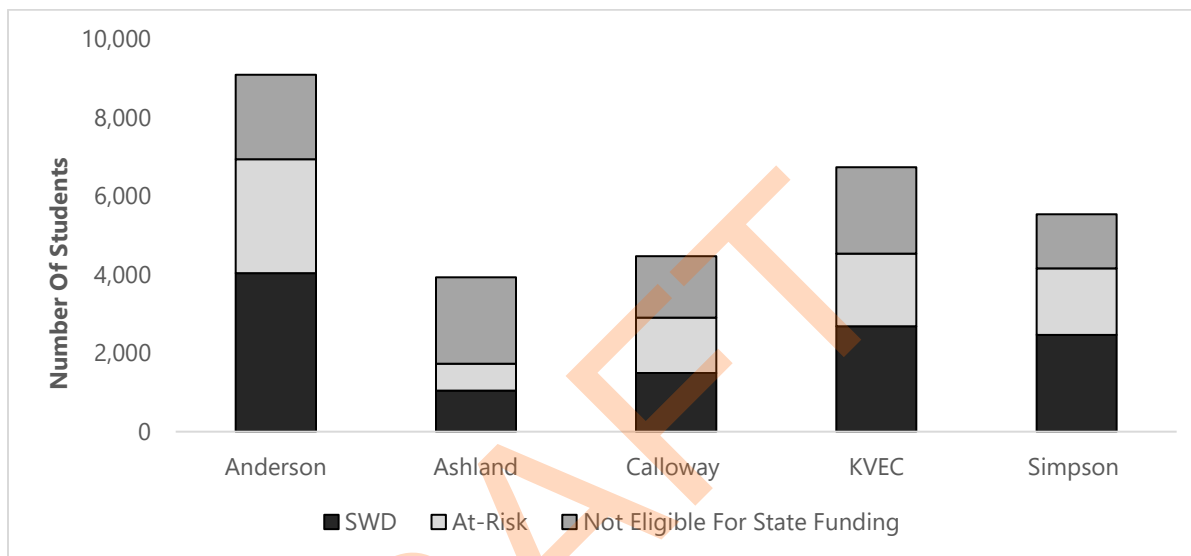
Figure 1.B shows the count of students attending preschool in districts within each RTC in 2024. Counts are shown by students that were eligible for funding because they were identified with a disability (SWD); those eligible because they were at-risk; and other preschool students that were not eligible for state funding.^d

Numbers vary considerably among RTC regions, but preschool children who receive state-funding because they have a disability outnumber at-risk students in every RTC.

^c Districts may charge tuition for preschool students who do not qualify for state funding. Data available for this study did not indicate whether students were enrolled on a tuition basis.

^d State funding is provided for individual students in one category only. At-risk numbers include only students who qualify for at-risk and have not been identified with a disability.

Figure 1.B
Numbers Of Preschool Students
By State Funding Category
Districts Served By RTCs
SY 2024



Note: SWD = students with disabilities.

Source: Staff analysis of data from the Kentucky Department of Education.

In school year 2024, about 39 percent of preschool students were children with disabilities, 29 percent were considered at-risk because of economic disadvantage, and 32 percent were other preschoolers not eligible for state funding.

Table 1.2 shows the number and percent of preschool students in each state funding category by RTC. As a percentage of all preschool students, students with disabilities were 39 percent and at-risk students were 29 percent. The percent of preschool students with disabilities varied among RTC districts, from a low of 27 percent in Ashland RTC to a high of 44 percent in Anderson and Simpson RTCs. Appendix B shows this information for individual districts within each RTC.

Table 1.2
Numbers And Percent of Preschool Students
By State Funding Category And RTC Regions, SY 2024

Count of Students					Percent of Students		
RTC	At-Risk	SWD	Not Eligible	Total *	At-Risk	SWD	Not Eligible
Anderson	2,900	4,040	2,150	9,089	32%	44%	24%
Ashland	680	1,049	2,200	3,929	17	27	56
Calloway	1,414	1,495	1,561	4,469	32	33	35
KVEC	1,855	2,682	2,199	6,735	28	40	33
Simpson	1,698	2,464	1,379	5,540	31	44	25
Total*	8,545	11,730	9,487	29,762	29	39	32

*Due to rounding among individual districts, totals do not always sum.

Note: SWD = students with disabilities.

Source: Staff analysis of data from the Kentucky Department of Education.

The number of preschool teachers employed in districts served by each RTC varies substantially. The Anderson RTC serves 2.5 as many teachers as the Ashland RTC.

Preschool Teachers. Table 1.3 shows the distribution of the state's 1,228 preschool teachers among RTCs in the 2024 school year. The number of preschool teachers employed in districts served by each RTC varies substantially. The Anderson RTC serves 2.5 as many teachers as the Ashland RTC (373 and 148, respectively).

Table 1.3
Preschool Teachers In
Districts Served By RTCs
SY 2024

Reginal Training Center	Count Of Teachers	Percent Of All Teachers
Anderson	373	30%
Ashland	148	12
Calloway	182	15
KEDC	274	22
Simpson	251	20
Grand Total	1,228	100

Source: Staff analysis of data from the Kentucky Department of Education.

OEA staff noted many cases in which staffing data reflected incorrect or incomplete data for preschool personnel.

In compiling data for preschool personnel working in districts within each RTC region, OEA staff noted that many preschool personnel were being recorded as incorrect job class codes or not recorded at all in PSDs and CSDs. OEA has shared these concerns

with KDE. Consistent coding practices are necessary to ensure that accurate personnel data are available to decision makers.^e

RTC Funding

2024 IDEA B Preschool Funding

KDE uses IDEA B Preschool state set-aside funds to fund the RTCs; it allocated \$2.3 million from those funds in school year 2024. RTCs are funded exclusively through IDEA-B.

Currently, all five RTCs are funded exclusively through the Individuals with Disabilities Education Act (IDEA), Part B. KDE awards funds to RTCs from preschool set-aside funds administered by the department. 20 U.S. Code § 1419 specifies the amount that states can set aside for state services to benefit children with disabilities aged 3 through 5.

In fiscal year 2024, KDE received \$11,241,786 in IDEA B Preschool funds. Of this total, \$8,365,925 was distributed directly to districts to support local preschool programs. KDE retained the maximum allowable—\$575,187—for state administration and reserved \$2,300,674 in state set-aside funds; this set-aside is within the federal maximum of \$2,875,939 allowable. From the state set-aside, \$2,264,860 was allocated to RTCs to support professional development and technical assistance for preschool teachers.

KDE Appropriations To Each RTC

With the exception of Anderson, each RTC received \$448,367 from KDE in 2024. Anderson RTC received an additional \$23,025, for a total of \$471,392.

As shown in Table 1.4, KDE appropriated \$448,367 to each RTC in 2024, with the exception of Anderson RTC, which received an additional \$23,025. Anderson RTC received the additional funding because it serves the largest population of preschool students in the state. Total revenue reflects initial allocations by KDE as well as substantial increases in allocations from the department in April of 2024.^f

^e Districts are inaccurately reporting staff as preschool associate teachers in CSD data; CSD data indicated more than 4 times as many classified preschools associate teachers as were recorded in KDE's Local Education Assignment Data for teacher certifications (LEAD). In addition, 13 districts with preschool programs failed to enter any certified preschool teachers in PSD. Based on OEA staff analysis of LEAD data, at least 36 preschool teachers were not recorded in these districts.

^f The original funding allocations were \$383,753 for Anderson RTC and \$360,478 for the remaining RTCs. On April 1, 2024, KDE issued contract amendments that increased funding for each RTC. Anderson RTC received an additional \$87,639 (total: \$471,392), while other RTCs received an additional \$87,889 (total: \$448,367). The additional funds were designated for specific program enhancements, including: purchase of score booklets for the Teaching Pyramid Observation Tool (TPOT); coverage of pyramid-related travel

RTC funding per student varied widely among RTCs in 2024. Ashland RTC received 3.8 times more revenue than Anderson RTC per student with a disability or at-risk.

Table 1.4 also shows the amount allocated to each RTC per state-funded preschool student in the districts in each RTC service area. Funding per student is shown for students with disabilities only and also for students with disabilities and at-risk students as a group.

In each scenario, funding per student varied widely among RTCs; Anderson RTC received substantially less, and Ashland RTC received substantially more than most other RTCs. Ashland RTC received 3.6 times more than Anderson in per-student revenue for students with disabilities (\$427 versus \$117) and 3.8 times more revenue per state-funded student with a disability or at-risk (\$259 versus \$68).

Table 1.4
KDE RTC Appropriations Per Count Of Funded Students
SY 2024

RTC	Revenue	Number Of Children		Funding Per Child	
		Disability	Disability + At-Risk	Disability	Disability + At-Risk
Anderson	\$471,392	4,040	6,940	\$117	\$ 68
Ashland	448,367	1,049	1,729	427	259
Calloway	448,367	1,495	2,909	300	154
KVEC	448,367	2,682	4,537	167	99
Simpson	448,367	2,464	4,162	182	108
Total*	\$2,264,860	11,730	20,275	193	112

*Due to aggregating rounded numbers from individual districts, sum may not always total.
Source: Staff analysis of data from the Kentucky Department of Education.

expenses; delivery of additional summer training sessions focused on inclusive practices, assistive technology, and classroom application; collaboration across RTCs to host a statewide summer institute for preschool staff; and updates to RTC screening instruments and assessments for district use.

Recommendation 1:

Recommendation 1

The Kentucky Department of Education should review Regional Training Centers' district service areas and allocation of grant funding to ensure equitable access to Regional Training Center resources and services by participating districts.

RTC Program Operations

RTCs employ about three employees each. Each RTC provides regional training; on-site consultations; a lending library of materials; and annual statewide and regional collaborative institutes.

As outlined in the Memorandum of Agreement (MOA) with KDE for each RTC, the centers provide a range of services for early childhood programs, including regional trainings and workshops; on-site consultations; a lending library of materials; and annual statewide and regional collaborative institutes.

Personnel Employed By RTCs

As shown in Table 1.5, RTCs employ about three employees each. Each RTC has its own director and between 1-2.5 consultants or coaches. Three RTCs also employ an administrative assistant.

**Table 1.5
Personnel By RTC, 2024**

RTC	Director	Consultant/ Coach	Administrative Assistant	Total Personnel
Anderson	1	1	1	3
Ashland	1	2		3
Calloway	1	2.5		3.5
KVEC	1	1	1	3
Simpson	1	1	1	3

Source: Staff analysis of documents from the Kentucky Department of Education

Expenditures

Salary and benefits comprise the majority of all RTC expenditures. Variation among RTCs in expenditure data in other categories indicates inconsistencies in the types of services, programs, and materials available to districts in different RTC regions.

Table 1.6 shows expenditures by RTC in 2024. Salaries and benefits comprised the majority (60) percent of all expenditures across RTCs, ranging from a low of 50 percent in the Ashland RTC to a high of 71 percent in the Simpson RTC.⁸

⁸ Salaries and benefits include the line items for certified salary, classified salary, and benefits.

Expenditures varied broadly among RTCs in categories such as professional services, supplies, travel, and indirect costs.

Outside of salaries and benefits, expenditures varied broadly among categories such as professional services, supplies, travel, and indirect costs. OEA staff review of the memorandum of agreement (MOA) for each RTC indicated that expenditures within these categories were for goods or services consistent with the RTC's contractual goals.^h Broad variation in expenditure data does, however, suggest inconsistency among RTCs in the types of services, programs, and materials available to personnel in different RTC regions.

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^h OEA did not analyze purchase orders or receipts in this analysis.

Table 1.6
Expenditures By RTC
2023-2024 Quarterly Financial Reports

Expenditure	Anderson	Ashland	Calloway	KVEC	Simpson	Total
Certified Salary	\$169,499	\$135,997	\$177,300	\$205,835	\$171,254	\$859,884
Classified Salary	41,106	25,129	-	-	60,270	126,505
Benefits	87,732	62,524	66,649	71,092	84,354	372,350
Registration Fees	-	3,140	-	465	4,990	8,595
Auditing Services	-	-	-	-	600	600
Professional Services	32,758	21,540	67,803	13,455	30,151	165,707
Equipment Repair	-	4,292	1,449	-	-	5,741
Vehicle Repair	66	-	13,245	-	1,386	14,697
Postage	-	-	400	-	132	532
Telephone	-	-	-	-	3,097	3,097
Electricity	-	-	-	-	2,070	2,070
Gasoline	-	-	-	-	1,568	1,568
Printing	-	-	358	-	-	358
Travel	30,219	15,995	16,894	4,252	16,238	83,598
Supplies	17,517	171,351	4,191	98,929	29,806	321,795
Supplementary Books	56,588	3,123	9,162	842	9,155	78,871
Textbooks	-	-	74,170	-	-	74,170
Supplies Technology	6,346	-	2,691	828	3,675	13,541
Furniture	-	4,935	447	-	2,365	7,747
Software	-	-	120	-	378	498
Tech Hardware	-	342	1,178	-	4,597	6,117
Copier rental	3,716	-	-	-	3,059	6,775
Other Miscellaneous	-	-	3,747	-	-	3,747
Dues & Fees	4,424	-	-	-	-	4,424
Rent	19,300	-	-	16,800	10,000	46,100
Fleet Insurance	-	-	-	-	7,646	7,646
Indirect Cost	-	-	8,564	35,869	-	44,433
Total Expenses	\$469,272	\$448,367	\$448,367	\$448,367	\$446,791	\$2,261,164

Source: Staff analysis of RTC quarterly project budget reports.

Data reviewed for this report indicate a need for increased fiscal oversight of RTCs by KDE.

Expenditure Concerns. Full fiscal review of RTC operations and KDE oversight of these operations was beyond the scope of this study. OEA's summary analysis of RTC program documentation and data, however, identified some issues that indicate a need for greater fiscal oversight by KDE. As described in Appendix C, some RTCs need increased oversight related to

- charging of indirect costs;
- ensuring requests for reimbursements reflect actual spending;
- timing in the recording of funds and in carryover of expenses;
- accurate and consistent recording of expenditures to the proper funds and function codes; and
- accurate recording of personnel.

Potential mingling of RTC and district resources. Appendix C identifies instances in which RTC host districts may be using funds allocated to the RTC to pay for expenses in the host district. In addition, districts are incorrectly recording RTC revenues and expenditures as the district's rather than as agency funds.

Recommendation 2

Recommendation 2:

The Kentucky Department of Education should ensure that Regional Training Centers apply correct and uniform coding practices for both expenditures and staffing classifications. For example, the Kentucky Department of Education should require that Regional Training Center financial accounts be established as agency funds rather than district funds.

Recommendation 3

Recommendation 3:

The Kentucky Department of Education should review Regional Training Center budgets and expenditures to ensure they are consistent with contractual requirements and state guidelines. These requirements include, but are not limited to, indirect and direct cost rates and exclusive use of Regional Training Centers' grant funding to support Regional Training Center activities.

RTC Objectives

RTC's contractual objectives are consistent with federal requirements as they are broadly aligned with the state's goals for preschool-aged children with disabilities.

OEA analysis of contractual objectives submitted by RTCs to KDE indicates that center activities broadly support goals included in KDE's SPP for IDEA B. Indicator 6 relates to placement of children with disabilities and Indicator 7 relates to improvements in social emotional skill; knowledge and skills; and use of appropriate behaviors.

Each RTC outlined four specific objectives in their 2024 MOAs with KDE. RTC objectives addressed the following areas:

- Pyramid model of behavior intervention and support (The pyramid model has been cited by federal guidelines as particularly appropriate to students with disabilities, but has also been documented to improve behavior outcomes for all students)
- Evidence-based and inclusive instructional practices for students who have disabilities or are at-risk
- Compliance, developmentally appropriate practices, regulations and IEP development consistent with IDEA
- Transition to kindergarten activities and parental involvement

Services included within the contractual objectives included consultation, training, and technical assistance. All of the objectives were broadly aligned with OSEEL's goals for students with disabilities as described in the SPP. The focus across RTCs on behavior intervention and support provides training for which data indicates need. Appendix D shows the behavior incidents and resolutions recorded for preschool students in 2024.

End-of-year reports indicate that each RTC provided a variety of trainings and supports associated with contractual objectives. In some cases, data provided by RTCs to KDE lacked sufficient evidence to determine whether specific contractual goals had been met.

Program Impact. Examining program impact was beyond the scope of this study. OEA's summary review of RTC's end-of-year reports indicated that each RTC provided a variety of trainings and supports associated with the contractual objectives. Staff review also identified gaps between the nature of data reported by RTCs and the data that would be necessary to indicate that specific goals were met. For example, OEA staff noted instances of:

- goals that lacked sufficient baseline data for performance evaluation;
- inadequate evidence to support attainment of quantified goals—such as percentage increases; and

- very low use rates (about 5 percent) of lending library materials in at least one RTC.

In addition, data provided in RTC reports in many cases were not sufficient to determine participation rates across RTC districts; success of online versus in-person training; or barriers to the participation of preschool personnel in RTC training.

Oversight Challenges

Efficiency and effectiveness of RTC operations might be improved with greater fiscal oversight by KDE. The existence of five separate centers and contracts may create undue burden on KDE staff responsible for oversight, relative to other delivery models for supporting preschool personnel.

Efficiency and effectiveness of RTC operations might be improved with greater oversight by KDE to RTC's proposed budgets, expenditures, and program impact. The existence of five separate centers, each with its own contract, set of measurable objectives, and director may create undue burden on KDE staff responsible for oversight, relative to other delivery models for supporting preschool personnel.ⁱ In addition, this decentralized model may place administrative burdens on RTC staff who might otherwise be assisting preschool personnel.

It is worth examining whether RTCs are the most effective or efficient means of providing services and supports to preschool personnel. Options for providing support have expanded since the centers were established 35 years ago.

Since RTCs were established 35 years ago, technology has evolved, increasing options for providing training and support or quickly and efficiently distributing instructional materials across the commonwealth. For this reason, it is worth examining whether RTCs are the most effective or efficient means of providing services and support to preschool personnel. Most support provided by KDE to local school districts follows a model in which regional support staff are employed directly by the Kentucky Department of Education.

Recommendation 4:

Recommendation 4

The Kentucky Department of Education should conduct an evaluation of the current structure of the Early Childhood Regional Training Centers to assess whether the existing model effectively and efficiently delivers support services to school districts. This evaluation should include a cost comparison between the current regional model and an alternative model in which staff are employed directly by the Kentucky Department of Education.

ⁱ OEA staff requested KDE documentation related to RTC evaluation or program impact relative to the contractual objectives. KDE reported that an RTC manager examined program impact relative to goals and gave related feedback to RTCs. That program manager is no longer employed by the department and KDE does not have access to any records related to this feedback.

Findings should be shared with the Education Assessment and Accountability Review Subcommittee and the Interim Joint Committee on Education. Based on findings of the report, the General Assembly may wish to consider amending or removing requirements of KRS 157.318 related to Early Childhood Regional Training Centers.

Conclusion

RTCs make training and support available to preschool personnel across the commonwealth. Greater KDE oversight of RTC programs is necessary to maximize accountability and impact. It may be beneficial to review the RTC program model relative to other means of providing regional support.

This study finds that RTCs make extensive training opportunities and instructional resources available to preschool personnel throughout the commonwealth. RTC services address areas of demonstrated need; while the services are focused primarily on improving outcomes for children with disabilities, most are also relevant to improving outcomes for at-risk or other preschool students. Greater KDE review and oversight of RTC programs is necessary, however, to ensure equitable allocation of resources across the centers and to maximize the centers' fiscal accountability and program impact. Further, it may be beneficial for KDE to evaluate the effectiveness and efficiency of the RTC model relative to other means of providing regional support.

Appendix A

Statutory Direction for RTCs

157.318 Network of regional training centers for preschool and early childhood education established.

- (1) There is hereby established a network of regional training centers for preschool and early childhood education as specified in the 1987 state preschool grant application for Public Law 99-457. The purpose of the regional training centers shall be to provide peer to peer training, consultation, technical assistance, and materials to personnel from local school districts and other agencies operating programs for disabled and at-risk preschool children.
- (2) The regional training centers shall receive federal funds from Public Law 99-457, Education of the Handicapped Act, Part B, and may receive state appropriations, gifts, and grants. No additional centers shall be established unless the existing centers receive at least the same level of funding as in the 1988 fiscal year.
- (3) The Kentucky Board of Education shall promulgate such regulations as may be needed in the administration of the regional training centers. In administering this section, the chief state school officer shall consult with the regional training centers and the districts and agencies served by this program.

Effective: July 15, 1996

History: Amended 1996 Ky. Acts ch. 362, sec. 6, effective July 15, 1996. -- Amended 1994 Ky. Acts ch. 405, sec. 23, effective July 15, 1994. -- Created 1990 Ky. Acts ch. 453, sec. 1, effective July 13, 1990.

Appendix B

RTC Districts And Preschool Populations

Table B.1
Number and Percent of Preschool Students
By District And Funding Category, SY 2024

RTC	District	Number				Percent		
		At-Risk	SWD*	Not Eligible	Total	At-Risk	SWD*	Not Eligible
Anderson	Anchorage Independent	-	5	11	16	0	31	69
Anderson	Anderson County	33	84	75	192	17	44	39
Anderson	Augusta Independent	7	7	4	18	39	39	22
Anderson	Bardstown Independent	49	108	134	291	17	37	46
Anderson	Beechwood Independent	5	10	22	36	13	28	58
Anderson	Bellevue Independent	8	19	32	59	14	32	54
Anderson	Boone County	161	360	83	604	27	60	14
Anderson	Bracken County	11	40	8	58	18	69	12
Anderson	Bullitt County	149	149	126	423	35	35	30
Anderson	Burgin Independent	4	6	13	23	17	26	57
Anderson	Campbell County	19	116	71	206	9	56	34
Anderson	Carroll County	7	31	125	163	4	19	77
Anderson	Covington Independent	112	129	39	280	40	46	14
Anderson	Dayton Independent	25	21	50	96	26	22	52
Anderson	Eminence Independent	9	10	28	47	19	21	60
Anderson	Erlanger-Elsmere Independent	21	57	36	114	18	50	32
Anderson	Fort Thomas Independent	2	40	22	64	3	63	34
Anderson	Frankfort Independent	13	15	24	52	25	29	46
Anderson	Franklin County	82	123	38	243	34	51	16
Anderson	Gallatin County	62	15	49	126	49	12	39
Anderson	Grant County	49	53	17	119	41	45	14
Anderson	Harrison County	51	38	35	124	41	31	28
Anderson	Henry County	61	32	44	137	45	23	32
Anderson	Jefferson County	1,248	1,233	177	2,658	47	46	7
Anderson	Kenton County	136	225	145	506	27	44	29
Anderson	Ludlow Independent	7	13	13	33	21	39	39
Anderson	Marion County	34	62	18	114	30	54	16
Anderson	Nelson County	44	123	98	265	17	46	37

RTC	District	Number				Percent		
		At-Risk	SWD	Not Eligible	Total	At-Risk	SWD	Not Eligible
Anderson	Newport Independent	44	17	18	79	56	22	23
Anderson	Nicholas County	17	15	42	74	23	20	57
Anderson	Oldham County	43	165	35	242	18	68	14
Anderson	Owen County	29	38	35	101	28	38	34
Anderson	Pendleton County	17	73	48	138	12	53	35
Anderson	Scott County	101	223	39	363	28	61	11
Anderson	Shelby County	83	144	28	254	32	57	11
Anderson	Southgate Independent	13	2	6	21	62	10	29
Anderson	Spencer County	27	65	78	170	16	38	46
Anderson	Trimble County	44	16	47	107	41	15	44
Anderson	Walton-Verona Independent	12	43	40	94	12	46	41
Anderson	Washington County	20	44	37	101	20	44	37
Anderson	Williamstown Independent	1	3	100	104	1	3	96
Anderson	Woodford County	43	66	62	171	25	39	36
Anderson	Kentucky School for the Deaf	-	2	1	3	0	67	33
Ashland	Ashland Independent	19	35	146	199	9	18	73
Ashland	Bath County	15	19	30	64	23	30	47
Ashland	Boyd County	6	59	192	257	2	23	75
Ashland	Breathitt County	24	77	27	128	19	60	21
Ashland	Carter County	83	31	57	171	49	18	33
Ashland	Elliott County	-	11	3	14	0	79	21
Ashland	Fairview Independent	23	12	8	43	53	28	19
Ashland	Fleming County	8	32	38	78	10	41	49
Ashland	Floyd County	-	33	253	286	0	12	88
Ashland	Greenup County	61	30	27	118	52	25	23
Ashland	Harlan County	53	50	40	143	37	35	28
Ashland	Harlan Independent	9	61	55	124	7	49	44
Ashland	Hazard Independent	38	33	8	79	48	42	10
Ashland	Jackson Independent	1	15	4	20	5	75	20
Ashland	Jenkins Independent	12	4	15	31	39	13	48
Ashland	Johnson County	-	16	172	188	0	9	91
Ashland	Knott County	21	48	19	87	24	55	21
Ashland	Lawrence County	31	43	37	110	28	39	33
Ashland	Leslie County	31	33	64	128	24	26	50
Ashland	Letcher County	7	34	17	58	12	59	29
Ashland	Lewis County	25	40	10	75	33	53	13
Ashland	Magoffin County	-	13	122	135	0	10	90

Office of Education Accountability

RTC	District	Number				Percent		
		At-Risk	SWD	Not Eligible	Total	At-Risk	SWD	Not Eligible
Ashland	Martin County	-	1	127	128	0	1	99
Ashland	Mason County	12	94	(3)	103	11	91	-3
Ashland	Menifee County	1	6	17	23	2	26	70
Ashland	Morgan County	-	4	35	39	0	10	90
Ashland	Paintsville Independent	-	2	40	42	0	5	95
Ashland	Perry County	92	51	75	218	42	23	34
Ashland	Pike County	31	26	431	488	6	5	88
Ashland	Pikeville Independent	1	11	6	18	6	61	33
Ashland	Raceland-Worthington Independent	7	24	46	77	9	31	60
Ashland	Robertson County	3	2	27	32	9	6	84
Ashland	Rowan County	61	84	52	197	31	43	26
Ashland	Russell Independent	8	15	5	28	29	54	18
Ashland	Wolfe County			-				
KVEC	Barbourville Independent	3	15	21	39	8	38	54
KVEC	Bell County	17	6	139	162	10	4	86
KVEC	Berea Independent	17	23	9	49	35	47	18
KVEC	Bourbon County	3	20	181	204	1	10	89
KVEC	Boyle County	47	51	36	134	35	38	27
KVEC	Casey County	34	26	-	60	57	43	0
KVEC	Clark County	84	176	242	502	17	35	48
KVEC	Clay County	3	48	98	149	2	32	66
KVEC	Corbin Independent	30	42	33	105	29	40	31
KVEC	Danville Independent	35	62	23	120	29	52	19
KVEC	East Bernstadt Independent	18	38	5	61	30	62	8
KVEC	Estill County	56	50	31	137	41	36	23
KVEC	Fayette County	501	588	44	1,133	44	52	4
KVEC	Garrard County	23	41	41	105	22	39	39
KVEC	Jackson County	42	68	43	152	27	45	28
KVEC	Jessamine County	129	118	60	307	42	38	20
KVEC	Knox County	34	82	50	165	20	50	30
KVEC	Laurel County	59	329	9	396	15	83	2
KVEC	Lee County			-				
KVEC	Lincoln County	5	22	197	224	2	10	88
KVEC	Madison County	43	160	46	249	17	64	18
KVEC	McCreary County	70	45	42	157	45	29	27
KVEC	Mercer County	36	93	61	189	19	49	32
KVEC	Middlesboro Independent	15	10	58	82	18	12	70
KVEC	Montgomery County	30	126	78	234	13	54	33

RTC	District	Number				Percent		
		At-Risk	SWD	Not Eligible	Total	At-Risk	SWD	Not Eligible
KVEC	Owsley County	5	1	124	130	4	1	95
KVEC	Paris Independent	23	11	53	87	26	13	61
KVEC	Pineville Independent	5	16	16	37	14	43	43
KVEC	Powell County	38	37	6	81	47	46	7
KVEC	Pulaski County	159	155	130	444	36	35	29
KVEC	Rockcastle County	65	70	10	144	45	49	6
KVEC	Science Hill Independent	9	7	13	29	31	24	45
KVEC	Somerset Independent	32	23	17	72	44	32	24
KVEC	Wayne County	92	49	26	166	55	30	15
KVEC	Whitley County	63	61	255	379	17	16	67
KVEC	Williamsburg Independent	33	13	5	51	65	25	10
Calloway	Ballard County	7	48	50	105	7	46	48
Calloway	Caldwell County	61	19	41	121	50	16	34
Calloway	Calloway County	62	51	85	197	31	26	43
Calloway	Carlisle County	13	48	25	86	15	56	29
Calloway	Christian County	138	135	55	328	42	41	17
Calloway	Crittenden County	22	30	10	61	35	49	15
Calloway	Daviess County	150	171	147	468	32	37	31
Calloway	Dawson Springs Independent	17	29	17	63	27	46	27
Calloway	Fulton County	12	14	31	57	21	25	54
Calloway	Fulton Independent	12	4	20	36	33	11	56
Calloway	Graves County	23	119	73	215	11	55	34
Calloway	Henderson County	178	90	114	381	47	24	30
Calloway	Hickman County	6	15	55	75	7	20	72
Calloway	Hopkins County	93	124	102	319	29	39	32
Calloway	Livingston County	3	6	51	60	5	10	85
Calloway	Lyon County	9	18	31	57	15	32	53
Calloway	Marshall County	36	74	69	178	20	42	38
Calloway	Mayfield Independent	22	65	83	170	13	38	49
Calloway	McCracken County	128	140	28	295	43	47	9
Calloway	McLean County	11	25	40	75	14	33	52
Calloway	Muhlenberg County	104	78	84	266	39	29	32
Calloway	Murray Independent	2	42	84	128	2	33	66
Calloway	Owensboro Independent	100	52	17	169	59	31	10
Calloway	Paducah Independent	104	25	128	257	40	10	50
Calloway	Trigg County	46	20	26	91	50	22	27
Calloway	Union County	44	17	53	114	39	15	46
Calloway	Webster County	15	36	46	97	15	37	47

RTC	District	Number				Percent		
		At-Risk	SWD	Not Eligible	Total	At-Risk	SWD	Not Eligible
Simpson	Adair County	32	68	6	105	30	65	5
Simpson	Allen County	82	41	14	137	60	30	10
Simpson	Barren County	65	178	114	356	18	50	32
Simpson	Bowling Green Independent	98	51	36	185	53	28	19
Simpson	Breckinridge County	-	33	135	168	0	20	80
Simpson	Butler County	59	36	19	114	52	32	17
Simpson	Campbellsville Independent	38	23	9	69	54	33	12
Simpson	Caverna Independent	19	26	11	56	34	46	20
Simpson	Clinton County	13	81	11	105	12	77	10
Simpson	Cloverport Independent	7	6	5	18	39	33	28
Simpson	Cumberland County	18	17	22	57	32	30	39
Simpson	Edmonson County	24	89	27	140	17	64	19
Simpson	Elizabethtown Independent	29	45	13	87	33	52	15
Simpson	Glasgow Independent	56	68	80	204	27	33	39
Simpson	Grayson County	60	102	111	273	22	37	41
Simpson	Green County	27	20	30	77	35	26	39
Simpson	Hancock County	13	26	28	67	19	39	42
Simpson	Hardin County	165	483	150	798	21	61	19
Simpson	Hart County	12	137	11	159	7	86	6
Simpson	LaRue County	37	48	28	113	33	42	25
Simpson	Logan County	25	100	91	216	12	46	42
Simpson	Meade County	27	95	54	176	15	54	31
Simpson	Metcalfe County	25	26	30	81	31	32	37
Simpson	Monroe County	31	56	27	114	27	49	24
Simpson	Ohio County	58	53	84	195	30	27	43
Simpson	Russell County	63	49	24	136	46	36	18
Simpson	Russellville Independent	42	29	23	93	45	31	24
Simpson	Simpson County	37	49	19	105	35	47	18
Simpson	Taylor County	49	29	55	133	37	22	41
Simpson	Todd County	37	87	48	172	22	51	28
Simpson	Warren County	452	313	66	831	54	38	8
State Totals	STATE	8,545	11,730	9,487	29,762	29	39	32

*SWD= student with disability

Source: Staff analysis of data from the Kentucky Department of Education

Appendix C

Issues Indicating Need for Greater Fiscal Oversight

Indirect Costs

Only KVEC and Calloway RTCs reported indirect costs. Calloway County used the KDE 2024 indirect cost rate of 1.77% to charge \$8,564 in indirect costs. In contrast, KVEC applied a rate of 8% and charged \$35,869. KVEC indirect costs were more than four times greater than Calloway RTC's indirect costs.

KVEC's inclusion of rent (\$16,800) is unusual given that this cost is typically covered under indirect cost pools.

Timing And Carryover

Although the 2024 RTC contracts began on September 20, 2023, all centers began charging expenditures in July 2023, prior to the initiation of the MOA. Additionally, two districts failed to fully expend allocated funds by the September 30, 2024 contract end date. Because KDE did not secure approval to extend these contracts, unexpended funds should have lapsed. However, the funds were carried forward into the subsequent year.

In 2024, one district moved \$52,830 from the general fund expenses in the 2024 school year to the preschool RTC 2020 grant. This violates the terms of the 2020 contract and also suggests that the district may have used RTC 2020 funds to pay for a district expense.

Accurate Reporting Of Revenues And Expenditures On AFRs And Quarterly Reports

Expenditures of RTCs are recorded in the AFRs of districts in which the centers are located. In reviewing AFRs, staff identified a number of ways in which expenditures are improperly or inconsistently recorded.

It is important that RTCs receive reimbursements only for RTC expenses. Staff review of quarterly financial reports indicated, however, that some RTCs requested reimbursements that did not reflect their actual expenditures as indicated on the quarterly project budget reports.

Improper fund classification. While RTCs are physically located in individual school districts, they operate as service providers to a consortium of districts. As such their revenues and expenditures should be established as agency funds and not included in the revenue or expenditures reported for the district itself. KDE has directed districts to record RTC revenues and expenditures in Fund 2 which are special revenue funds of the district itself. Recording RTC revenues and expenditures in Fund 2 inflates the total revenues and expenditures of the host district, which may be especially impactful in smaller districts.

Lack of consistency in expenditure coding Districts were also inconsistent in the function codes used in recording expenditures. For example, one RTC coded all expenditures as professional development while another allocated expenditures between regular instruction and special instruction and a third coded expenditures under program coordinator and regular instruction.

Classification of Staff

RTC staff were coded under a variety of professional roles, including:

- Diagnostic/Assessment Counselor
- Program Specialist I
- Early Childhood Consultant
- Exceptional Child Consultant
- Director of Federal Programs

In addition, all districts are recording RTC staff as employees of the district. RTC staff should be coded as being on a memorandum of agreement (MOA) with KDE.

It may be that RTC staff's professional roles reflect previous roles with the district that were not updated when they were assigned as RTC staff. In the event that RTC are carrying out duties in the classifications reported above, they may be providing services to the host district that do not benefit all districts within the RTC region .

Potential Mingling Of RTC And District Resources

While RTCs are located within particular districts, funds are allocated to support personnel in all districts included within the RTC region and should not be used to support expenses that disproportionately benefit the district in which the RTCs are housed. Data indicated a need for guidance in use of RTC funds to support vehicle expenses and in the possible use of RTC funds to support district personnel. Note that in some cases RTC districts may be using district funds to support RTCs.

Appendix D

2024 Preschool Student Behavior Data

Behavior Data For Preschool Students

Final reports submitted by Regional Training Centers (RTCs) to the KDE consistently identified challenging student behavior as their greatest area of need for technical assistance. Data shown below indicate that, while the number of behavior events recorded for preschool students are relatively small, these events include serious offenses that often result in restraint or suspension.

Behavior Incidents

As shown in Table D.1, a total of 219 preschool student behavior incidents were reported in the 2024 school year. KDE divides violations into those that can be considered a violation of the law and those that are a violation of board policy. Note that law violations need not result in criminal proceedings. While there is no minimum age for criminal prosecution in the commonwealth, charges are rarely filed against preschool-aged children.

Of the behavior incidents recorded for preschool children in 2024, 161 (74 percent) were classified as board violations, while 58 incidents (26 percent) were classified as law violations.

Exceptional children (children with disabilities) accounted for the majority of behavior incidents, with 137 incidents. Incidents reported for exceptional children were 63 percent of incidents reported though they were only 39 percent of the preschool population. Male students accounted for 186 incidents (85 percent).

Table D.1
Preschool Behavior Incidents By RTC
SY 2024

Regional Training Center	Violations			Exceptional Child		Gender	
	Board Violations	Law Violations	Total	Exceptional Child	Non-Exceptional Child	Female	Male
Anderson RTC	92	37	129	81	48	14	115
Ashland RTC	6	4	10	3	7	1	9
KVEC RTC	32	9	41	23	18	13	28
Callaway RTC	14	3	17	12	5	4	13
Simpson RTC	17	5	22	18	4	1	21
Total	161	58	219	137	82	33	186

Note: Students coded to 98 and 99 in A-1 and A-4 schools.

Source: Staff analysis of data from the Kentucky Department of Education.

Law violations included 24 cases of third- or fourth-degree assault, 13 cases of student threats, eight incidents of teacher abuse, one case of weapon possession, and one case of terroristic threatening. Among board violations, 32 incidents involved students fighting staff and 13 involved students fighting peers.

Behavior Resolutions

Data on disciplinary resolutions indicate that preschool students who engaged in behavior incidents frequently experienced significant consequences. As shown in Table D.2, nearly half of all cases (42 percent) involved restraint, and an additional 7 percent involved seclusion. Out-of-school suspension accounted for 30 percent of resolutions, while 21 percent resulted in in-school removal.

Table D.2
State Behavior Resolution Code
SY 2024

Resolution State Code	Resolution Count	Percent of Total Resolutions
In-School Removal	44	21%
Out of School Suspension	63	30
Restraint	89	42
Seclusion	15	7
Total	211	100

Note: Eight students had no resolution code

Source: Staff analysis of data from the Kentucky Department of Education.