

JEFFERSON COUNTY PUBLIC SCHOOLS
APA SPECIAL EXAMINATION CORRECTIVE ACTION PLAN



JCPS: APA SPECIAL EXAMINATION CORRECTIVE ACTION PLAN

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Corrective Action Plan: Summary at a Glance

32 Fully Implemented • 99 Partially Implemented • 52 Not Implemented • 9 Alternative Action • 192 Total

Chapter 01: District Leadership and Strategy

Recommendation	Implementation Status	Page
1.1.a	Not Implemented	9
1.2.a	Fully Implemented	9
1.3.a	Fully Implemented	10
1.4.a	Fully Implemented	11
1.5.a	Not Implemented	11
1.6.a	Fully Implemented	12
1.7.a	Not Implemented	13
1.7.b	Not Implemented	13
1.8.a	Not Implemented	14
1.9.a	Not Implemented	15

Chapter 02: Jefferson County Board of Education

Recommendation	Implementation Status	Page
2.1.a	Alternative Action	16
2.2.a	Not Implemented	16
2.2.b	Not Implemented	17
2.3.a	Partially Implemented	18
2.4.a	Partially Implemented	18
2.5.a	Not Implemented	19
2.6.a	Not Implemented	20
2.7.a	Not Implemented	20
2.8.a	Not Implemented	21
2.9.a	Not Implemented	22

Chapter 03: Internal Audit

Recommendation	Implementation Status	Page
3.1.a	Alternative Action	23
3.2.a	Partially Implemented	24
3.3.a	Partially Implemented	24
3.4.a	Not Implemented	25
3.5.a	Not Implemented	25
3.6.a	Not Implemented	26
3.7.a	Alternative Action	26

3.8.a	Fully Implemented	27
3.9.a	Alternative Action	28
3.9.b	Not Implemented	28
3.10.a	Not Implemented	28
3.11.a	Not Implemented	29
3.11.b	Not Implemented	29

Chapter 04: Finance

Recommendation	Implementation Status	Page
4.1.a	Partially Implemented	31
4.1.b	Partially Implemented	31
4.2.a	Partially Implemented	32
4.3.a	Partially Implemented	32
4.3.b	Partially Implemented	33
4.3.c	Partially Implemented	33
4.4.a	Alternative Action	34
4.5.a	Partially Implemented	34
4.5.b	Partially Implemented	36
4.5.c	Partially Implemented	37
4.5.d	Fully Implemented	37
4.6.a	Partially Implemented	38
4.6.b	Partially Implemented	39
4.6.c	Partially Implemented	40
4.7.a	Not Implemented	41
4.8.a	Fully Implemented	41
4.9.a	Partially Implemented	42
4.9.b	Not Implemented	42
4.10.a	Not Implemented	43
4.11.a	Partially Implemented	43
4.12.a	Not Implemented	43
4.13.a	Fully Implemented	44
4.14.a	Partially Implemented	44
4.15.a	Fully Implemented	45
4.16.a	Not Implemented	45
4.17.a	Fully Implemented	46
4.17.b	Partially Implemented	46
4.17.c	Not Implemented	47

4.17.d	Not Implemented	47
4.17.e	Partially Implemented	48
4.18.a	Partially Implemented	48
4.18.b	Partially Implemented	49
4.19.a	Not Implemented	49
4.19.b	Not Implemented	50
4.19.c	Partially Implemented	51

Chapter 05: Talent and Retention

Recommendation	Implementation Status	Page
5.1.a	Partially Implemented	53
5.2.a	Partially Implemented	53
5.3.a	Not Implemented	54
5.4.a	Partially Implemented	54
5.4.b	Partially Implemented	55
5.4.c	Partially Implemented	55
5.4.d	Not Implemented	56
5.4.e	Not Implemented	56
5.5.a	Partially Implemented	57
5.6.a	Partially Implemented	58
5.6.b	Partially Implemented	58
5.7.a	Partially Implemented	59
5.8.a	Partially Implemented	59
5.9.a	Partially Implemented	60
5.10.a	Partially Implemented	60

Chapter 06: Operations and Technology

Recommendation	Implementation Status	Page
6.1.a	Not Implemented	62
6.2.a	Fully Implemented	62
6.3.b	Alternative Action	63
6.3.a	Fully Implemented	63
6.4.a	Not Implemented	64
6.5.a	Not Implemented	64
6.5.b	Fully Implemented	64
6.6.a	Fully Implemented	65
6.6.b	Fully Implemented	65
6.7.a	Partially Implemented	66

6.8.a	Partially Implemented	66
6.8.b	Partially Implemented	67
6.9.a	Partially Implemented	68
6.10.a	Partially Implemented	68
6.11.a	Alternative Action	69
6.12.a	Partially Implemented	70
6.12.b	Not Implemented	70
6.13.a	Partially Implemented	71
6.14.a	Partially Implemented	71

Chapter 07: Bus Safety

Recommendation	Implementation Status	Page
7.1.a	Fully Implemented	73
7.2.a	Partially Implemented	73
7.3.a	Partially Implemented	74
7.4.a	Partially Implemented	75
7.5.a	Fully Implemented	75

Chapter 08: Student Supports, Culture and Climate

Recommendation	Implementation Status	Page
8.1.a	Fully Implemented	76
8.2.a	Not Implemented	76
8.3.a	Not Implemented	77
8.4.a	Not Implemented	77
8.5.a	Not Implemented	78
8.6.a	Fully Implemented	78
8.7.a	Not Implemented	79
8.8.a	Fully Implemented	79
8.9.a	Partially Implemented	80
8.10.a	Not Implemented	81
8.11.a	Fully Implemented	81
8.12.a	Partially Implemented	82
8.12.b	Alternative Action	83
8.13.a	Partially Implemented	83
8.14.a	Partially Implemented	84

Chapter 09: Curriculum and Instruction

Recommendation	Implementation Status	Page
9.1.a	Not Implemented	86
9.1.b	Not Implemented	87
9.2.a	Partially Implemented	88
9.2.b	Partially Implemented	88
9.3.a	Partially Implemented	89
9.4.a	Partially Implemented	90
9.5.a	Partially Implemented	90
9.6.a	Partially Implemented	91
9.7.a	Partially Implemented	92
9.8.a	Partially Implemented	92

Chapter 10: Assessments, Accountability, and Systems Improvement

Recommendation	Implementation Status	Page
10.1.a	Not Implemented	94
10.2.a	Partially Implemented	95
10.3.a	Partially Implemented	96
10.4.a	Partially Implemented	96
10.5.a	Partially Implemented	98
10.6.a	Fully Implemented	99
10.7.a	Not Implemented	100
10.8.a	Partially Implemented	101

Chapter 11: Diversity, Equity, and Poverty

Recommendation	Implementation Status	Page
11.1.a	Partially Implemented	103
11.2.a	Partially Implemented	103
11.3.a	Partially Implemented	104
11.4.a	Fully Implemented	105
11.4.b	Fully Implemented	106
11.5.a	Alternative Action	106
11.6.a	Not Implemented	107
11.7.a	Fully Implemented	107
11.8.a	Fully Implemented	108
11.8.b	Fully Implemented	109
11.9.a	Partially Implemented	109

Chapter 12: Exceptional Child Education

Recommendation	Implementation Status	Page
12.1.a	Fully Implemented	111
12.1.b	Fully Implemented	111
12.1.c	Partially Implemented	112
12.2.a	Partially Implemented	113
12.3.a	Partially Implemented	113
12.3.b	Partially Implemented	114
12.3.c	Partially Implemented	115
12.4.a	Partially Implemented	115
12.5.a	Partially Implemented	116
12.5.b	Partially Implemented	116
12.5.c	Partially Implemented	117
12.5.d	Partially Implemented	117
12.5.e	Partially Implemented	118
12.6.a	Partially Implemented	118
12.6.b	Partially Implemented	119
12.6.c	Partially Implemented	119
12.7.a	Partially Implemented	120
12.7.b	Partially Implemented	120
12.7.c	Partially Implemented	121
12.8.a	Partially Implemented	121
12.8.b	Partially Implemented	122
12.8.c	Partially Implemented	122
12.9.a	Partially Implemented	123
12.9.b	Partially Implemented	124
12.10.a	Fully Implemented	124
12.10.b	Fully Implemented	125
12.10.c	Partially Implemented	125
12.11.a	Not Implemented	126
12.11.b	Not Implemented	126

Chapter 13: Multilingual Resources and Support

Recommendation	Implementation Status	Page
13.1.a	Partially Implemented	127
13.2.a	Not Implemented	127
13.3.a	Partially Implemented	128

Chapter 14: College and Career Readiness

Recommendation	Implementation Status	Page
14.1.a	Not Implemented	130
14.1.b	Not Implemented	130
14.1.c	Partially Implemented	131
14.2.a	Partially Implemented	131
14.3.a	Partially Implemented	132
14.3.b	Partially Implemented	134
14.4.a	Partially Implemented	134
14.4.b	Partially Implemented	135
14.5.a	Fully Implemented	135

Chapter 01: District Leadership and Strategy

Finding 1.1

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

Recommendation 1.1.a

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

Implementation Status: Not Implemented

Corrective Action Already Taken

The Board approved significant revisions to the District Organizational Chart with changes to the structure of divisions and departments to better align with the strategic goals of the District.

The Cabinet is currently the same size as in 2025, with 13 members who report directly to the Superintendent. In the coming year, the Superintendent will assess whether the number of direct reports should be reduced and how.

Deleted Cabinet Positions: Chief of Staff; Chief Exceptional Child Education; Chief Accountability, Research, and Systems Improvement; Chief Communications and Community Relations Officer; Chief Equity Officer; Chief Financial Officer; Chief Information Technology Officer; Chief of Talent

New Cabinet Positions: Special Assistant to the Superintendent; Executive Officer Exceptional Child Education; Executive Officer Accountability, Research, and Systems Improvement; Executive Officer Communications and Community Relations Officer; Chief, Opportunity and Access; Chief Business Officer (Finance, IT, and HR report to Chief Business Officer); Chief of Strategy and Innovation; Executive Officer Student Support and Community Engagement

Retained Cabinet Positions: General Counsel; Chief Academic Officer; Chief of Police; Chief Operations Officer; Director of Internal Audit (reports dually to the Board and Superintendent)

The Board approved the reorganization over several meetings: February 13, 2026; March 10, 2026; and March 31, 2026. The changes went into effect on July 1, 2026.

The updated organizational chart serves as evidence that this change occurred.

Corrective Action Planned

In the coming year, the Superintendent will assess whether the number of direct reports should be reduced and in what manner.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Lynn Reynolds, Special Assistant to the Superintendent

Finding 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.

Recommendation 1.2.a

JCPS should redistribute the departments and teams that fall under the Chief of Staff to other JCPS divisions.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The Board approved significant revisions to the District Organizational Chart with changes to the structure of divisions and departments to better align with the strategic goals of the District. The Board approved the reorganization over several meetings: February 13, 2026; March 10, 2026; and March 31, 2026. The changes went into effect on July 1, 2026.

As part of the reorganization, the Chief of Staff position was eliminated and the departments and teams that were under the Chief of Staff have been distributed to other Jefferson County Public Schools (JCPS) divisions.

The newly created position Special Assistant to the Superintendent has no divisions and departments reporting to them. The Special Assistant to the Superintendent is a strategic advisor to the Superintendent and has some responsibilities similar to a traditional Chief of Staff.

The Board approved the reorganization over several meetings: February 13, 2026; March 10, 2026; and March 31, 2026. The changes went into effect on July 1, 2026.

The updated organizational chart serves as evidence that this change occurred.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Melvin Brown, Executive Officer Talent

Finding 1.3

The new Special Assistant to the Superintendent role serves as a strategic advisor to the superintendent, rather than the Chief of Staff.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The Board approved the position of Special Assistant to the Superintendent on August 19, 2025. The Special Assistant to the Superintendent has no divisions and departments reporting to them. The Special Assistant to the Superintendent serves as a strategic advisor to the Superintendent and has some responsibilities similar to a traditional Chief of Staff.

The Chief of Staff position was eliminated based on a reorganization approved by the Board on February 13, 2026.

The Board approved the position of Special Assistant to the Superintendent on August 19, 2025. The current Special Assistant to the Superintendent began in that role on September 8, 2025.

The Chief of Staff position was eliminated beginning July 1, 2026.

The revised organizational chart serves as evidence that this change occurred.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Melvin Brown, Executive Officer Talent

Finding 1.4

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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The Board approved significant revisions to the District Organizational Chart with changes to the structure of divisions and departments to better align with the strategic goals of the District. As part of the reorganization, the position of Assistant Director of Accountability and Research was eliminated, effective July 1, 2026.

The Board approved the reorganization over several meetings: February 13, 2026; March 10, 2026; and March 31, 2026. The changes went into effect on July 1, 2026.

The revised organizational chart serves as evidence that this change occurred.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Melvin Brown, Executive Officer Talent

Finding 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.

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.

Implementation Status: Not Implemented

Corrective Action Planned

JCPS has not historically had SBDM Councils at special schools because, under state law, they are considered alternative education programs rather than schools.

The definition is found in KRS 160.380(1)(b) and 704 KAR 19:002 Alternative Education Programs and is as follows: *Alternative education program* means a program that exists to meet students' needs that cannot be addressed in a traditional classroom setting but through the assignment of students to alternative classrooms, centers, or campuses that are designed to remediate academic performance, improve behavior, or provide an enhanced learning experience. Alternative education programs do not include career or technical centers or departments.

Because these are alternative education programs distinct from A1 schools, it is unclear whether the SBDM statute, KRS 160.345, governs.

The District will undertake an assessment of the feasibility of instituting SBDMs or, potentially, Advisory Leadership Teams in lieu of SBDMs, for the District's alternative education programs. Advisory Leadership Teams are used in low-performing Comprehensive School Improvement (CSI) schools where the authority of the SBDM has been removed. They are a mechanism by which schools can engage in collaborative decision making and improve communication.

The Chief Academic Officer and Zone Assistant Superintendents supervising alternative education programs will lead this effort.

The SBDM Specialist in the Opportunity and Access Division monitors the establishment and activities of SBDM Councils on an ongoing basis.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Regional Superintendents

Finding 1.6

2022 Senate Bill 1, the Kentucky Supreme Court's 2025 decision in *Coleman v. Jefferson County Board of Education*, 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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

Two JCPS staff members, the Executive Director of Government and Community Relations and the Executive Director of Policy and Systems, track legislation closely during legislative sessions to understand the potential impact on the District.

Once the General Assembly adjourns *sine die*, the District has a formal, structured process for updating Board policies based on legislative action. As is the case for virtually all Kentucky public school districts, JCPS uses the Kentucky School Boards Association (KSBA) policy service, which provides model language for each policy needing amendment based on legislative action. General Counsel staff, content experts across divisions, and the Policy Committee review the model policies.

The Executive Director of Policy and Systems staffs the Policy Committee which plays a purely advisory role to the Board. Meetings comply with the Open Meetings Act. Frequently, the KSBA model language is adopted without change, and sometimes, the District recommends changes while remaining in compliance with the law. The committee's membership includes two Board members, the Superintendent, General Counsel, Special Assistant to the Superintendent, Chief of Strategy and Innovation, Executive Director the Jefferson County Association of School Administrators (JCASA), President of the Jefferson County Teachers Association (JCTA), President of the Teamsters Local 783, and President of Jefferson County Association of Education Support Personnel (AFSCME). Other Board members are invited and frequently participate.

The Board did not adopt a complete set of policies to implement Senate Bill 1 passed in 2022 because the Board sued to halt implementation of the legislation and many of the most important provisions did not go into effect while the litigation moved through the courts. In December 2025, the Kentucky Supreme Court declared Senate Bill 1 (2022) unconstitutional.

Regarding policies for Senate Bill 1 (2026), the Executive Director of Policy and Systems drafted more than 170 policies and administrative procedures to implement the legislation. Attorneys in the General Counsel's Office, as well as the Policy Committee, reviewed those over two meetings. The policies were on the Board Meeting Agenda for First Reading on July 21, 2026, but were pulled from the agenda because a Jefferson Circuit Court judge issued an injunction on July 20, 2026, preventing numerous sections of Senate Bill 1 from going into effect. The policies relating to the sections of Senate Bill 1 that were not enjoined and are in effect were approved at the August 11, 2026, Board meeting. If Senate Bill 1 goes into effect at some later date, the rest of the policies will be sent to the Board for approval.

Regarding policies for Senate Bill 4, as well as all other policies requiring amendment to implement legislation passed in 2026, the process described above was followed.

The policies were on the July 21, 2026, Board meeting agenda for first reading and were on the August 11, 2026, Board meeting agenda for second reading and approval. State law requires that amendments to policies required due to legislative action be approved by August 15 of each year. JCPS met that deadline.

Board meeting minutes and the updated online *JCPS Policy and Procedure Manual* serve as evidence that this change occurred.

Target Completion Date: August 11, 2026

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: Jonathan Lowe, Executive Director of Policy and Systems

Finding 1.7

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

Recommendation 1.7.a

JCPS should develop an updated strategic plan that includes a current mission, vision, values, priorities, goals, metrics, and action steps.

Implementation Status: Not Implemented

Corrective Action Planned

Senate Bill 1 (2026) requires the Board to, “by December 1 each year, approve a rolling five (5) year strategic plan for the District that outlines student outcome goals, faculty and staff improvement goals, facility and infrastructure improvement, and other key objectives that the superintendent and board believe are in the best interest of student outcomes and the community.” While a Jefferson Circuit Court Judge issued an injunction on July 20, 2026, preventing many important provisions of Senate Bill 1 (2026) from going into effect, the Board did not challenge the strategic plan provision, so this is state law.

The Chief of Strategy and Innovation will be leading the development of the strategic plan. The person to be hired for a newly created position, the Strategic Planning Specialist, will support the Chief. Having a highly qualified person dedicated to the development of the strategic plan aligns with the Senate Bill 1 requirement of a rolling five-year strategic plan. It will ensure that the District has a coherent set of action steps to achieve the District’s goals and actively monitors outcomes against the goals and indicators of progress.

In June 2026, the District issued a Request for Proposals for a Strategic Plan Development Consultant and received 12 responses. The American Association of School Administrators submitted the successful proposal, and the Board approved a contract at the July 21, 2026, Board meeting.

This Chief of Strategy and Innovation and the Strategic Planning Specialist will lead this effort.

The strategic plan will be updated annually by December 1, with regular updates provided to the Board regarding action steps taken and progress toward goals based on measurable indicators.

Target Completion Date: December 2, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Strategic Planning Specialist (to be hired)

Finding 1.7

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

Recommendation 1.7.b

JCPS should publicize the updated strategic plan and align all web and print materials to align with updated information.

Implementation Status: Not Implemented

Corrective Action Planned

The Communications Division will coordinate with the Chief of Strategy and Innovation and the Chief Academic Officer to develop a coherent roll-out plan ensuring wide distribution of the strategic plan and providing opportunities for gaining a better understanding of the plan, including the mission, vision, and values set forth in the plan; the goals for student success; and the ways in which the District will measure progress.

Communications will be tailored to distinct stakeholder groups (e.g., Administrators, Teachers, JCPS families, and community members).

Communications and Community Relations, Strategy and Innovation, and Academics will lead this effort.

The Communications Division will track implementation of all action steps in the roll-out plan.

January 1, 2027 (The strategic plan is due December 1, 2026.)

Target Completion Date: January 1, 2027

Accountable Chief / Division: Barnard Baker, Executive Officer Communications and Community Relations

Operational Lead / Owner: Rachel Scott, Executive Director of Communications and Community Relations

Finding 1.8

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

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.

Implementation Status: Not Implemented

Corrective Action Planned

As noted in the APA Special Report, JCPS has policies in place prohibiting retaliation, and the Office of Compliance and Investigations works proactively to foster a workplace environment of respect and to respond to employee grievances alleging mistreatment. Board Policy 02.12 Duties of the Superintendent states, in part, "The Superintendent shall ... work to foster a culture within the District that values and promotes authentic and forthright communication among employees, administrators, and Board members to better meet the needs of students, promote fairness, and improve organizational efficiency and performance." Having such policies and structures in place, however, is insufficient to change a workplace culture that has arisen over decades.

The Superintendent recognizes that changing workplace culture in a District the size of JCPS is a significant challenge. It will take time for a culture shift to take hold as attitudes and actions change. But immediate and concrete actions must be taken, and strong leadership must be shown to set up the District for success. The Superintendent is committed to ensuring that the District and school leaders understand expectations to eliminate actions by Supervisors who create fear of retaliation. The Superintendent is also committed to ensuring that the District and school leaders are equipped with tools and strategies to create opportunities for open and respectful communication and the free exchange of ideas.

The Superintendent will direct the Executive Officer Talent to convene a School and District Culture Team with representatives from all divisions and employee organizations (e.g., JCTA, Teamsters, AFSCME, Service Employees International Union [SEIU]). The team will be charged with analyzing the extent of the problem, identifying root causes, developing strategies based on research and best practices, developing an action plan with a timeline, and monitoring implementation. The team will work with the Accountability, Research, and Systems Improvement (ARSI) Division to develop a monitoring system to measure implementation and impact.

The Superintendent, the Executive Officer Talent, and leaders in all divisions will lead this effort.

The School and District Culture Team will work with the ARSI Division to develop a monitoring system to measure implementation and impact.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Melvin Brown, Executive Officer Talent

Finding 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.

Recommendation 1.9.a

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

Implementation Status: Not Implemented

Corrective Action Planned

The Executive Officer Talent will convene a working group with representatives of divisions that have extensive interactions with community organizations. The working group will identify opportunities and strategies for collaboration, alignment, and coordination and develop an implementation plan. The working group will consider the adoption of a CRM system to manage community partner relations Districtwide, taking into account potential benefits, organizational capacity, and cost. The working group will also consider other mechanisms to streamline and align District relationships with community partners.

Communications, with support from Strategy and Innovation, General Counsel, Academics, the Office of Multilingual Learners, and Student Support and Community Engagement, will lead this effort.

The working group will report its determination and the implementation plan to the Superintendent and the Special Assistant to the Superintendent.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Communications

Operational Lead / Owner: Barnard Baker, Executive Officer Communications and Community Relations

Chapter 02: Jefferson County Board of Education

Finding 2.1

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.

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.

Implementation Status: Alternative Action

Alternative Action

No change in the existing process is warranted.

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 that Board members pose using the Board Q&A structure receive responses from District leadership. All responses are distributed to all Board members and posted to the 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 that a Board member does not wish to make public, the Superintendent and Cabinet members are available to respond to queries from individual Board members.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent (Secretary to the Board)

Operational Lead / Owner: Angie Gilpin, Assistant to the Secretary to the Board

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The Board Chair sets the Board agenda in collaboration with the Superintendent. District-led presentations and discussions, which the Board Chair approves 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. By definition, these are high-impact agenda items.

The Superintendent and Board Chair will work to ensure that Board meeting agendas include more frequent and regular presentations and discussions regarding student outcomes. In addition to providing regular updates on

student achievement data, presentations will include information regarding the systems and strategies being deployed in schools to improve student learning.

The presentation regarding student outcomes will be aligned with the goals and metrics that will be included in the JCPS rolling five-year strategic plan, which will be approved by December 1, 2026, and updated annually.

There are only two members of the Board who serve on the Policy Committee, so moving policy discussions and presentations to that venue would not be an efficient or effective means to improve Board knowledge to inform decision making and performance.

The Policy Committee has a very different responsibility—to review Board policies and recommend to the Board the approval of amendments to Board policies. This is a critically important function to ensure compliance with state and federal law and improve District management and operations.

The Board Chair and Superintendent will lead this effort.

As agendas for future meetings are developed, and a cadence of regular presentations and discussions regarding student outcomes is established, the Board Agenda Planning Calendar will be updated to ensure those agenda items are included on an ongoing basis.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent; and Corrie Shull, Board Chair

Operational Lead / Owner: Angie Gilpin, Assistant to the Secretary of the Board

Finding 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.

Recommendation 2.2.b

The Board should integrate student-led presentations and demonstrations of their learning into public meetings.

Implementation Status: Not Implemented

Corrective Action Planned

The Board Chair sets the Board agenda in collaboration with the Superintendent. They will consider the inclusion of student-led presentations in Board meetings, taking into account the value of such demonstrations to have an impact on student learning; the need to spend a greater amount of time on high-impact agenda items and discussion of student outcomes; and the degree to which Board members have other opportunities to see student-led presentations and other demonstrations of student learning in the school setting.

Board members have opportunities to observe authentic demonstrations of student learning through visits to classrooms in schools. Board members also attend formal student Defenses of Learning, which are culminating student-led presentations in grades five, eight, and twelve as part of the JCPS Journey to Success. The Journey to Success is a developmental framework that represents a District shift toward transformational, student-driven learning. It was created to empower students to explore their interests, showcase their learning, and develop the skills they need to thrive.

The Board Chair and Superintendent will lead this effort.

The Executive Director of Policy and Systems will regularly review the Board Agenda Planning Calendar.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent; Corrie Shull, Board Chair

Operational Lead / Owner: Angie Gilpin, Assistant to the Secretary of the Board

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The use of the Consent Calendar is a highly efficient way for the Board to manage the very large number of materials that are required to be approved by the Board under state law. The Board will continue to use the Consent Calendar because it is necessary to manage the sheer volume of routine administrative matters and because it provides transparency since everything is available for public inspection prior to any Board action.

On December 9, 2025, the Board made a policy change relating to transparency in budgetary matters, adding the language provided below.

Board Policy 04.1 Budget Planning and Adoption: After the Working Budget is approved by the Board, an item submitted to the Board for approval that requires a new budget allocation beyond that which was approved in the Working Budget shall specify the amount of the additional budget allocation required.

This will allow the Board and the public to know when funds are being recommended to be allocated outside of the approved annual budget.

Corrective Action Planned

The vast majority of consent items are routine administrative actions, although a certain number of them might be considered high-impact due to financial implications (e.g., the approval of plans to build a new school, high-dollar-amount contracts for professional development).

The Board Chair sets the Board agenda in collaboration with the Superintendent. They have a standing meeting 15 days prior to each Board meeting to review a draft agenda. They make adjustments to the agenda as needed. The Board Chair and the Superintendent will review items on the Consent Calendar during those standing meetings and will make a determination regarding which high-impact consent items should be made action items, creating an opportunity for Board discussion.

The Superintendent, Board Chair, and Assistant to the Secretary of the Board will lead this effort.

The Executive Director of Policy and Systems will conduct periodic reviews of Board meeting agendas.

Target Completion Date: September 1, 2026

Accountable Chief / Division: Corrie Shull, Board Chair; Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Angie Gilpin, Assistant to the Board Secretary

Finding 2.4

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

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Processes for providing Board members with timely, complete information in advance of major decisions were strengthened, including a structured Board Q&A process for documenting and publicly posting responses to member questions prior to scheduled meetings.

Community engagement was expanded throughout the 2025-26 school year through public meetings, stakeholder forums, budget discussions, facilities and consolidation meetings, and multilingual communications.

Districtwide priorities to the community were established and communicated, including Every Student. Every Year, which is anchored by commitments to Academic Excellence and Growth, Student Well-Being and Belonging, Opportunity and Access, and Strong Systems and Responsible Stewardship.

These actions were completed by June 30, 2026.

The Online Board Agenda, along with press releases, social media, and recordings highlighting community forums and other opportunities for community input, serve as evidence that these actions occurred.

Corrective Action Planned

A comprehensive, strategic planning process has been initiated to establish unified District goals, measurable student outcome indicators, and an accountability framework to guide governance decisions. One of the components of that process will be to offer stakeholder and community members multiple opportunities to share their input on the values, mission, and vision that they want to guide the work of the District and the priorities on which they wish the District to focus.

Additionally, the District will develop strategies to increase two-way communication with District families and community members.

Communications and Community Relations and Strategy and Innovation will lead this effort.

The Communications Division will periodically review the number and type of opportunities for two-way communication between the Board and JCPS families and community members.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Barnard Baker, Executive Officer Communications and Community Relations

Operational Lead / Owner: Rachel Scott, Executive Director of Communications and Community Relations

Finding 2.5

The Board of Education webpage on the JCPS website does not list all active Board committees or the participating members.

Recommendation 2.5.a

The District should update and actively maintain the Board of Education webpage to reflect all active committee titles, purpose, and membership.

Implementation Status: Not Implemented

Corrective Action Planned

The District will update and actively maintain the Board of Education webpage to reflect all active committee titles, purpose, and membership.

The Executive Director for Policy and Systems will be responsible for updating and maintaining the information on the District website, with support of the Information Technology Division.

The General Counsel, who is the Supervisor for the Executive Director for Policy and Systems, will check with them during biweekly meetings to monitor progress. Progress and completion of this corrective action will be part of the formative and summative evaluations for the Executive Director of Policy and Systems held every six months.

Target Completion Date: October 2, 2026

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: Jonathan Lowe, Executive Director of Policy and Systems

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The District will standardize formatting for Board committee meeting minutes.

The Executive Director for Policy and Systems will be responsible for preparing a template for meeting minutes to be distributed to staff who are responsible for preparing meeting minutes for Board committees.

The General Counsel, who is the Supervisor for the Executive Director for Policy and Systems, will check with them during biweekly meetings to monitor progress. Progress and completion of this corrective action will be part of the formative and summative evaluations for the Executive Director of Policy and Systems held every six months.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: Jonathan Lowe, Executive Director of Policy and Systems

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.

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.

Implementation Status: Not Implemented

Corrective Action Planned

The Board Chair and the Superintendent will confer with the General Counsel to determine the evaluation criteria, process, and timeline for the annual evaluation of the Superintendent.

Based on the direction of the Board Chair, the Executive Director for Policy and Systems will: 1. Prepare a Superintendent evaluation timeline and 2. Draft an amendment to Board Policy 02.14 Evaluation of the Superintendent to include revised evaluation criteria for review by the Board Chair, Superintendent, General Counsel, and the Policy Committee. The timeline and revised Board Policy will be submitted to the Board for approval in March 2027. The timeline and revised policy will be distributed to Board members and relevant stakeholders.

Waiting until 2027 to complete these corrective actions is appropriate because the membership of the Board will change significantly due to the passage of Senate Bill 4 (2026), which reduces the number of Board members from seven to five and changes the boundaries for Board districts. Also, because the current Board Chair is not running for a seat on the reconstituted Board, there will be a new Board Chair beginning in January 2027.

The General Counsel, who is the Supervisor for the Executive Director for Policy and Systems, will check with them during biweekly meetings to monitor progress. Progress and completion of this corrective action will be part of the formative and summative evaluations for the Executive Director of Policy and Systems held every six months.

Target Completion Date: March 31, 2027

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: Jonathan Lowe, Executive Director of Policy and Systems

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.

Recommendation 2.8.a

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

Implementation Status: Not Implemented

Corrective Action Planned

The Board and Superintendent will establish unified District goals to measure student outcomes and the District's overall success as part of the development of a new strategic plan.

Senate Bill 1 (2026) requires the Board to, "by December 1 each year, approve a rolling five (5) year strategic plan for the district that outlines student outcome goals, faculty and staff improvement goals, facility and infrastructure improvement, and other key objectives that the superintendent and board believe are in the best interest of student outcomes and the community." While a Jefferson Circuit Court Judge issued an injunction on July 20, 2026, preventing many important provisions of Senate Bill 1 (2026) from going into effect, the Board did not challenge the strategic plan provision, so this is state law.

The Chief of Strategy and Innovation will lead the development of the strategic plan. The person to be hired for a newly created position, the Strategic Planning Specialist, will support the Chief. Having a highly qualified person dedicated to the development of the strategic plan aligns with the Senate Bill 1 requirement of a rolling five-year strategic plan. It will ensure that the District has a coherent set of action steps to achieve the District's goals and actively monitors outcomes against the goals and indicators of progress.

In June 2026, the District issued a Request for Proposals for a Strategic Plan Development Consultant and received 12 responses. The American Association of School Administrators submitted the successful proposal, and the Board approved a contract at the July 21, 2026, Board meeting.

The Board and the Superintendent are ultimately responsible for establishing unified District goals to measure student outcomes and the District's overall success. The Chief of Strategy and Innovation and the Strategic Planning Specialist will lead the process for developing the strategic plan.

The strategic plan will be updated annually by December 1, with regular updates provided to the Board regarding action steps taken and progress toward goals based on measurable indicators.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Strategic Planning Specialist (to be hired)

Finding 2.9

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

Recommendation 2.9.a

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

Implementation Status: Not Implemented**Corrective Action Planned**

The Board Chair will work with the General Counsel and the Executive Director of Policy and Systems to develop an Administrative Procedure that sets forth a Board evaluation framework. The Administrative Procedure will be placed on a Board meeting agenda for Board review.

The Board Chair will establish regular Board self-evaluations on the Board meeting calendar.

The Executive Director of Policy and Systems will lead this effort.

Once a regular cadence of Board self-evaluations is established, the Executive Director of Policy and Systems will include Board self-evaluations on the Board Agenda Planning Calendar so that they are included in future meetings.

Target Completion Date: March 31, 2027

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: Jonathan Lowe, Executive Director of Policy and Systems

Chapter 03: Internal Audit

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.

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.

Implementation Status: Alternative Action

Alternative Action

Kentucky law prohibits the Board, and by extension Audit and Risk Management Advisory Council (ARMAC) as a Board committee, from performing or formally participating in the governance of the Internal Audit Director's performance evaluation. KRS 160.180(3) subjects a Board member to removal from office for attempting to influence the hiring or personnel treatment of any school district employee other than the Superintendent or Board attorney, and KRS 160.380(1)(a) vests all personnel actions exclusively with the Superintendent. Because a performance evaluation can bear directly on employment status, General Counsel has confirmed that the Board and ARMAC cannot legally perform, adopt, or otherwise formally co-own the Internal Audit Director's evaluation. The recommendation's underlying intent—-independent, objective input into the evaluation, consistent with IIA Global Internal Audit Standards Domain III (Standard 8.1, Board Interaction)—is instead addressed through the alternative process described under the "Corrective Action Planned" section.

Corrective Action Planned

The Internal Audit Director's annual performance evaluation will continue to be performed by the Superintendent's Office using the existing Major Summative Evaluation instrument (goal-setting, midyear, and year-end review), consistent with KRS 160.180(3) and KRS 160.380(1)(a).

To incorporate independent, objective input consistent with the recommendation's intent and IIA Standard 8.1, ARMAC will independently complete a standardized scoring rubric, tied to Internal Audit Standards and the Internal Audit Charter, and submit its completed rubric to the Superintendent as input into the evaluation. ARMAC will not jointly perform, adopt, or otherwise formally co-own the evaluation itself.

Internal Audit, in consultation with General Counsel, will document this arrangement—including the statutory limitation and the compensating rubric-input process—as the District's documented position on this IIA Standards essential condition, co-acknowledged by the Superintendent's Office and General Counsel.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Office of the Superintendent; Board of Education

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Internal Audit has been granted access to the Board Q&A document, allowing visibility into Board member inquiries directed to Internal Audit. Separately, Board Policy 4.9, adopted January 28, 2025, established a formal protocol requiring requests for Internal Audit services and status inquiries to be transmitted directly to Internal Audit, without filtering.

Corrective Action Planned

Board Policy 4.9 will be amended to broaden its scope beyond audit-service requests to address all Board member communications directed to Internal Audit, establishing that Internal Audit's responses to Board inquiries, regardless of the mechanism through which the inquiry is received or published, shall not be edited, redacted, or subject to approval. Administratively, Internal Audit will establish direct, unsupervised access to publish responses within the Board Q&A tool (or its successor).

Target Completion Date: December 1, 2026

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

A Board member was informally assigned in fall 2025 to attend ARMAC meetings and provide informal communication back to the full Board. This assignment remains in place.

Corrective Action Planned

Board Policy 4.9 will be amended to add a principle-level requirement that a Board member be designated to attend audit committee meetings in a non-voting capacity and report informally to the full Board. The ARMAC Charter will separately be amended to formally define the non-voting Board liaison role, including responsibilities and reporting expectations. This charter amendment will be developed and adopted alongside other ARMAC Charter amendments arising from related Chapter 3 and 4 recommendations.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Kevin Brown, General Counsel

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

Internal Audit will develop a formal ARMAC Operating Procedure establishing: 1. A standardized Post-Meeting Communication, prepared by Internal Audit within 48 hours of each ARMAC meeting and transmitted by the ARMAC Chairperson to the Board Chairperson and Superintendent, consistent with Charter Section VI; 2. Two standing Board presentation slots per year, anchored to the District's financial governance calendar—one in October, coinciding with the Annual Financial Audit and working budget discussion, and one in May, aligned with the Tentative Budget review cycle—to be incorporated into the Board's Annual Calendar Adoption beginning calendar year 2027; and 3. An Annual Written Report Template mapped to the eight reporting areas enumerated in Charter Section VI, with the completed report submitted to the Board in conjunction with the May presentation. The Board's designated ARMAC liaison (see Recommendation 3.3a) will also provide informal verbal updates to the full Board at the next Board meeting following each ARMAC meeting.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Office of the Superintendent; Board of Education

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 3.5

Two members of ARMAC have served beyond the period recommended in the ARMAC Charter.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

A one-year transition period (July 1, 2026–June 30, 2027) will apply to the two currently affected members (ARMAC Chair and Vice Chair), who have continued to serve beyond the recommended length under General Counsel’s prior holdover authorization. The transition period is intended to allow adequate time to recruit and onboard qualified replacement members with the necessary audit committee expertise, particularly given current District conditions that have made recruitment for these roles more difficult.

Continued service by the affected Chair and Vice Chair through the transition period will require affirmative Board approval, following the same process used for a new ARMAC member appointment.

Separately, Internal Audit will build and maintain an ARMAC Membership Tracking Table (member name, appointment date, term start/end, consecutive terms served, term limit status), updated semiannually and presented to the Board as a standing component of ARMAC’s twice-annual Board presentations, to ensure ongoing Board visibility into member term status going forward.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Kevin Brown, General Counsel; Board of Education

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

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.

Implementation Status: Not Implemented

Corrective Action Planned

Internal Audit will post all released Internal Audit reports—including findings, recommendations, and management responses, along with the Internal Audit Summary Annual Engagement Follow-Up Report and the annual Risk Assessment and Audit Plan—to a dedicated Internal Audit page on the JCPS public website. Internal Audit will be responsible for uploading each report as it is released and for maintaining the page on an ongoing basis as new reports are issued.

Target Completion Date: December 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 3.7

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.

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.

Implementation Status: Alternative Action

Alternative Action

The Quarterly Activity Report is an internal status report intended to give ARMAC, the Board, and the Superintendent's Office a concise snapshot of audit plan progress, completed and in-progress engagements, and investigation activity, not a substitute for the full detail of individual audit reports. Duplicating findings and recommendations within this report would make it substantially more laborious to produce and less likely to be read in full by its intended audience, undermining its purpose. Instead, this need is addressed through Recommendation 3.6.a, under which all released Internal Audit reports, including findings, recommendations, and management responses, will be posted publicly on the JCPS website, giving stakeholders a complete and authoritative source for that detail. Additionally, any significant risk warranting interim communication ahead of the annual risk assessment will continue to be documented and communicated separately, outside the Quarterly Activity Report, given the potential sensitivity of such matters.

Corrective Action Planned

None beyond the action described in the "Alternative Action" section

Target Completion Date: December 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

Internal Audit issues the Summary Annual Engagement Follow-Up Report each fiscal year as a standing item on the Internal Audit Plan. The report is distributed to ARMAC, the Board, the Superintendent, and applicable Chiefs and Division leaders, consistent with distribution of all Internal Audit reports.

Target Completion Date: August 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Alternative Action

Alternative Action

Complaints or concerns regarding fraud, waste, or abuse received directly by Internal Audit (outside the hotline intake mechanism) are incorporated into Internal Audit's investigative workflow and are already tracked and reported through the Quarterly Activity Report, which documents investigations initiated, completed, and in progress regardless of intake source. Because the Quarterly Hotline Report Summary is specific to hotline-originated complaints, including non-hotline complaints in that report would conflate two distinct intake channels rather than add transparency.

Corrective Action Planned

None beyond the action described in the "Alternative Action" section

Target Completion Date: August 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

Internal Audit will expand the corrective action form requirement to other JCPS departments. This will allow Internal Audit to capture and report resolution outcomes for applicable referral categories within the Quarterly Hotline Report Summary, consistent with how school-zone referrals are already tracked. Complaints involving discrimination or harassment, investigated by Compliance and Investigations, will no longer be received through the hotline as of October 1, 2026, and are therefore excluded from this corrective action.

Target Completion Date: October 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 3.10

Currently, the Quarterly Hotline Report Summary is provided only upon request to the Board.

Recommendation 3.10.a

JCPS should provide the Quarterly Hotline Report Summary prepared for the Superintendent to members of the Board on a routine basis.

Implementation Status: Not Implemented

Corrective Action Planned

Internal Audit will distribute the Quarterly Hotline Report Summary to all Board members on a routine quarterly basis, consistent with its existing distribution to ARMAC and the Superintendent's Office, rather than providing it only upon request.

Target Completion Date: October 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Already Taken: None

Corrective Action Planned

In connection with the District's transition to a new compliance hotline service provider effective October 1, 2026, which will include language translation support for JCPS's top-five spoken languages. Internal Audit will increase visibility of the hotline in two ways: 1. Semiannual promotion of the hotline through JCPS newsletters distributed to parents and employees, beginning with the provider transition, and 2. Renaming the hotline's listing on the JCPS website from the current generic "Incident Reporting" label to language that clearly identifies it as the anonymous compliance hotline.

Target Completion Date: October 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Already Taken: None

Corrective Action Planned

The Quarterly Hotline Report Summary will be posted publicly on the JCPS website, on the same Internal Audit page where Internal Audit reports are posted (see Recommendation 3.6a). The report will be enhanced to include outcome indicators (e.g., substantiated/unsubstantiated) to the extent feasible, recognizing that referrals involving pending litigation may not fit that categorization.

Target Completion Date: December 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

Chapter 04: Finance

Finding 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.

Recommendation 4.1.a

The Purchasing Department should link to or integrate the General Counsel's contracting training within the Purchasing web page information to support streamlined communication and resources for staff around purchasing procedures.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Finance Department, General Counsel, and Internal Audit have collaborated to document a detailed contracts workflow for all types of contracts (PSCs, MOUs, DPAs, RFPs). This workflow chart and directions will be included in new trainings.

Corrective Action Planned

Upon establishment of a detailed, defined contracts workflow document, the Purchasing Department and the General Counsel webpage and communications will align for streamlined communication.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Wyatt Wynn, Director Purchasing

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

In July 2026, a Districtwide Legal Institute training for schools (required to send at least one representative) and Central Office leadership provided contracts training.

Corrective Action Planned

Upon creation of a detailed contracts workflow and directions document, a mandatory training will be provided for all staff who are responsible for engaging in, or entering requests for, contract services.

Target Completion Date: January 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Currently, contracts are archived in SharePoint. In 2026, JCPS has engaged with Euna Solutions for a Contract Management Module to handle the administrative procedures for contract management. This module is a searchable, digital platform for contract documents prior to Requisition. MUNIS is the state-required platform for documentation of Requisition documents, including Noncompetitive Negotiations, quotes, contracts, and confirmation approval emails.

Corrective Action Planned

To more explicitly address Finding 4.2, JCPS will act upon “authority violations” for employee failure to follow the administrative procedures associated with contracts. All Principals have been trained on authority violations. All staff involved in engaging in, or entering requisitions for, contracts will be trained on the contracts workflow and directions as well as consequences for authority violations.

Target Completion Date: January 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The *JCPS Purchasing Handbook* requires written quotes, submitted with Requisition, for purchases over \$10,000 along with three-quote documentation to receive a PO. For purchases \$5,000–\$10,000, three quotes must be documented on the Determination and Findings (D&F) Form. All Noncompetitive Negotiations approvals are documented with rationale. (For purchases under \$10,000, this is completed by providing a narrative on the D&F Form, which the Director of Purchasing reviews and approves. For purchases over \$10,000, the Executive Officer Finance must review and approve this written request in writing with rationale for approval.)

Corrective Action Planned

Noncompetitive Negotiation approvals will be housed in a common repository for auditing and transparency. Contracts now require “deliverables” that provide greater cost detail of services.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 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.

Recommendation 4.3.b

The Purchasing Department should implement updated procurement procedures to appropriately document noncompetitive negotiation conditions for sole source contracts prior to going to Board for approval.

Implementation Status: Partially Implemented

Corrective Action Already Taken

On November 18, 2025, the Board reviewed a new administrative procedure, 04.32 AP.11 Contracts and Purchases Using Noncompetitive Negotiations, which limited instances in which Noncompetitive Negotiations may be used and strengthened the processes by which determinations are made. All Noncompetitive Negotiations approvals are documented with rationale. (For purchases under \$10,000, this is completed by providing a narrative on the D&F Form, which the Director of Purchasing reviews and approves. For purchases over \$10,000, the Executive Officer Finance must review and approve this written request in writing with rationale for approval.)

Corrective Action Planned

Noncompetitive Negotiation approvals will be housed in a common repository for auditing and transparency. Contracts now require “deliverables” that provide greater cost detail of services.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Wyatt Wynn, Director Purchasing

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

All Noncompetitive Negotiations approvals are documented with rationale. (For purchases under \$10,000, this is completed by providing a narrative on the D&F Form, which the Director of Purchasing reviews and approves. For purchases over \$10,000, the Executive Officer Finance reviews and approves this written request in writing with rationale for approval.)

Corrective Action Planned

Noncompetitive Negotiation approvals will be housed in a common repository for auditing and transparency. Contracts now require “deliverables” that provide greater cost detail of services.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Wyatt Wynn, Director Purchasing

Finding 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.

Recommendation 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.

Implementation Status: Alternative Action

Alternative Action

The Information Technology Division and General Counsel are collaborating to align the DPA with the National DPA. This will remove the purchasing vehicle of the DPA.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Jesse Pracher, Digital Resource Coordinator

Finding 4.5

The District lacks processes for contract administration and performance oversight.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Administrative Procedure 04.32 AP.111 Professional Services Contract and Return On Investment (ROI) was revised December 2025 to include the following: identification of service deliverables, designation of a contract administrator, and an itemized receipt for payment. For contract vendors with aggregate amounts \$100,000 and greater, a review of contract performance is required as well as either (a) a strategic investment review cycle every three years (for recurrent contracts), or (b) an implementation quality review (for nonrecurrent contracts), or (c) a service delivery review (for limited or short-term contracts).

Corrective Action Planned

Implementation of actions in response to this recommendation requires collaboration among the Finance Division, Accountability, Research, and Systems Improvement (ARSI) Division, Academics Division, Opportunity and Access (O&A) Division, Information Technology (IT) Division, and Operations Division as well as cross-divisional collaboration. Administrative Procedure 04.32 AP.111 Professional Services Contract Process and ROI

Review will be realized with a documented process for identification of Key Performance Indicators (KPIs), establishment of measures for Returns on Investment (ROIs), procedures for vendor evaluation, and a prescribed process for reporting on either (a) a strategic investment review cycle every three years (for recurrent contracts), or (b) an implementation quality review (for nonrecurrent contracts), or (c) a service delivery review (for limited or short-term contracts).

JCPS has strengthened contract performance oversight through revised procurement procedures, a Differentiated Evaluation Model for Professional Service Contracts, and the development of the Strategic Investment Management System (SIMS). The evaluation framework establishes different levels of review based on contract scale, strategic relevance, and anticipated impact, including evaluation of contract deliverables, implementation KPIs, outcomes, and ROI where appropriate. During the 2026-27 school year, JCPS will fully implement SIMS to centrally track investments, expenditures, performance measures, and outcomes and will establish a standardized process for reporting significant contract and investment performance outcomes to District leadership and the Board.

The Finance Division and ARSI Division will jointly oversee the process. Cost Center Heads and project leads will remain responsible for contract management, deliverables, and required performance information. ARSI will lead evaluability assessments and development of KPIs and ROI measures for selected investments, while Finance will provide expenditure and contract implementation information.

SIMS will serve as the District's recurring monitoring mechanism for strategic investments. Project leads will update required KPI data annually by July 31, and ARSI and Finance will maintain performance and expenditure information within the system. Other professional service contracts will undergo the appropriate level of review established by the differentiated framework, including verification of deliverables, implementation data, or invoice-to-service matching. Strategic investments selected for ROI evaluation will undergo a three-year review cycle, and JCPS will establish an annual process for reporting significant performance and investment outcomes to District leadership and the Board.

Target Completion Date

November 2025—Completed: Administrative Procedure 04.32 AP.11 was revised to strengthen documentation, justification, due diligence, and approval requirements for applicable contracts and purchases. The procedure reflects a review/revision date of November 18, 2025.

December 2025–June 2026: SIMS and framework were developed.

August–September 2026: SIMS will be placed into operational use for the 2026-27 investment cycle.

December 2026: Initial evaluability screenings and development of logic models, KPIs, outcome measures, and ROI measures will be completed for investments selected for Strategic Investment Cycle Review.

January 2027: ARSI and Finance will conduct an initial implementation review of selected investments using SIMS performance, expenditure, and contract-deliverable information.

July 31, 2027: Project directors/Designated District liaisons will complete the first annual KPI update for investments subject to Strategic Investment Cycle Review, consistent with the established framework.

September 2027: JCPS will complete its first annual review of the 2026-27 investment portfolio and finalize the standardized format and process for reporting material vendor performance, investment outcomes, and ROI information to District leadership and the Board.

Thereafter: Annual performance updates will occur each July, with strategic investments completing ROI reviews at the end of the established three-year review cycle.

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Assessment, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Assessment, Research, and Systems Improvement

Finding 4.5

The District lacks processes for contract administration and performance oversight.

Recommendation 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 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Administrative Procedure 04.32 AP.111 Professional Services Contract and ROI was revised December 2025 to include the following: identification of service deliverables, designation of a contract administrator, and an itemized receipt for payment. For contract vendors with aggregate amounts \$100,000 and greater, a review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts).

Corrective Action Planned

Implementation of actions in response to this recommendation requires collaboration among the Finance Division, Academics, Research, and Systems Improvement (ARSI Division), Academics Division, Opportunity and Access (O&A) Division, Information Technology (IT) Division, and Operations Division as well as cross-divisional collaboration.

Administrative Procedure 04.32 AP.111 Professional Services Contract and ROI was revised December 2025 to include the following: identification of service deliverables, designation of a contract administrator, and an itemized receipt for payment. For contract vendors with aggregate amounts \$100,000 and greater, a review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts). ARSI will support the Finance Division's implementation of the revised contract administration process by providing expertise related to performance measures, KPIs, and evaluability for applicable professional service contracts and strategic investments. For investments selected for evaluation, ARSI will work with the responsible department to identify measurable outcomes and appropriate KPIs that can be incorporated into contract expectations and used to assess vendor performance. This aligns with the District's Differentiated Evaluation Model, which establishes implementation, outcome, and ROI measures based on the nature and evaluability of the investment.

The Finance Division will lead implementation of the revised contract administration requirements. The ARSI Division will provide support for contracts and investments requiring performance evaluation by conducting evaluability assessments and assisting project leads in developing logic models, KPIs, outcome measures, and ROI metrics.

For investments selected for Strategic Investment Cycle Review, ARSI will use SIMS to document evaluability assessments, KPIs, outcome measures, and ROI metrics. Project leads will update KPI data annually by July 31, with ARSI and Finance using the information to monitor implementation and performance. These recurring reviews will provide Finance and District leadership with performance information to support contract oversight, renewal, and future investment decisions.

Target Completion Date: July 1, 2027—Completion of the first annual KPI report

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 4.5

The District lacks processes for contract administration and performance oversight.

Recommendation 4.5.c

JCPS should update contract trainings and contract templates to include updated administration and oversight expectations.

Implementation Status: Partially Implemented

Corrective Action Already Taken

In July 2026, a Districtwide Legal Institute training for schools (required to send at least one representative) and Central Office leadership provided contracts training. General Counsel, Internal Audit, Finance, and Information Technology have collaborated on a contracts workflow detail and directions document.

Corrective Action Planned

Upon creation of a detailed contracts workflow and directions document, a mandatory training will be provided for all staff who are responsible for engaging in, or entering requests for, contract services.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 4.5

The District lacks processes for contract administration and performance oversight.

Recommendation 4.5.d

JCPS should provide vendor performance metrics to the Board as part of the contract renewal approval process.

Implementation Status: Fully Implemented

Corrective Action Already Taken

Administrative Procedure 04.32 AP.111 Professional Services Contract and ROI was revised December 2025 to include the following: identification of service deliverables, designation of a contract administrator, and an itemized receipt for payment. For contract vendors with aggregate amounts \$100,000 and greater, a review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts).

With this revision of the contract administration process, vendor performance metrics are required as part of applicable professional service contracts. Vendors are required to identify measurable performance expectations that can be used to assess delivery and outcomes. These performance measures provide the basis for evaluating vendor performance and informing contract renewal decisions. The District's differentiated evaluation framework further supports this process by establishing implementation, outcome, and ROI measures based on the type and scope of the contract.

The Finance Division and responsible contract administrator/project lead oversee the contract renewal process and ensure that required performance information is included. ARSI supports the process, as applicable, by assisting with the development and evaluation of KPIs, outcome measures, and ROI metrics for contracts selected for formal evaluation.

Vendor performance metrics are incorporated into the contract and renewal process, creating a recurring control at the point of contract renewal. Performance against the established metrics will be reviewed as part of the renewal

decision and provided with applicable contract renewal information presented to the Board. For investments subject to the Strategic Investment Cycle Review, performance information will also be maintained in SIMS to support ongoing monitoring and future funding decisions.

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Administrative Procedure 04.32 AP.111 Professional Services Contract and ROI was revised December 2025 to include the following for contract vendors with aggregate amounts \$100,000 and greater. A review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts).

Corrective Action Planned

JCPS will implement its revised cycle-based budgeting and investment review process through the Strategic Investment Management System (SIMS), formerly Investment Tracking System (ITS). The process will distinguish operational expenditures from strategic investments and use a structured proposal and evaluability review to inform investment decisions. For selected strategic investments, the process will also establish logic models, KPIs, outcome measures, and ROI metrics to connect District spending with implementation and results.

The Finance Division will lead the cycle-based budgeting and investment process and maintain financial information. ARSI will support the evaluation component by conducting evaluability assessments and working with project leads to develop appropriate KPIs, outcome measures, and ROI metrics for selected investments. Project leads will be responsible for providing required implementation and performance information.

SIMS will serve as the recurring monitoring and accountability mechanism for strategic investments. Project leads will update KPI data annually by July 31, while ARSI and Finance will maintain performance and expenditure information in SIMS. This information will be used to monitor implementation, assess results, and inform future funding and investment decisions. Selected strategic investments will also undergo periodic ROI review.

Target Completion Date

November 2025—Completed: Administrative Procedure 04.32 AP.11 was revised to strengthen documentation, justification, due diligence, and approval requirements for applicable contracts and purchases. The procedure reflects a review/revision date of November 18, 2025.

December 2025–June 2026: SIMS and framework are developed.

August–September 2026: SIMS will be placed into operational use for the 2026-27 investment cycle.

December 2026: Initial evaluability screenings and development of logic models, KPIs, outcome measures, and ROI measures will be completed for investments selected for Strategic Investment Cycle Review.

January 2027: ARSI and Finance will conduct an initial implementation review of selected investments using SIMS performance, expenditure, and contract-deliverable information.

July 31, 2027: Project directors/Designated District liaisons will complete the first annual KPI update for investments subject to Strategic Investment Cycle Review, consistent with the established framework.

September 2027: JCPS will complete its first annual review of the 2026-27 investment portfolio and finalize the standardized format and process for reporting material vendor performance, investment outcomes, and ROI information to District leadership and the Board.

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Administrative Procedure 04.32 AP.111 Professional Services Contract and ROI was revised December 2025 to include the following: identification of service deliverables, designation of a contract administrator, and an itemized receipt for payment. For contract vendors with aggregate amounts \$100,000 and greater, a review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts).

Corrective Action Planned

JCPS will use the Strategic Investment Management System (SIMS) to centrally track strategic investments, including alignment to District priorities, implementation milestones, KPIs, outcome measures, expenditures, and ROI measures where appropriate. The investment review process will require selected investments to demonstrate alignment with District priorities and establish measurable indicators for assessing implementation and impact.

The Finance Division and ARSI will jointly support implementation. Finance will maintain funding and expenditure information, while ARSI will conduct evaluability assessments and work with project leads to establish logic models, KPIs, outcome measures, and alignment with District goals. Project leads will be responsible for providing and updating required performance information.

SIMS will serve as the recurring monitoring mechanism for selected strategic investments. Project leads will update KPI data annually by July 31, and ARSI and Finance will maintain performance and expenditure data within the system. This information will support annual review of investment performance and future funding decisions. JCPS will also develop a standardized reporting process to provide the Board and public with

appropriate information regarding strategic investments, including funding, performance, alignment with District goals, and investment status.

Target Completion Date: September 2027—Completion of the first annual investment review cycle and establishment of the associated Board/public reporting process

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 4.6.c

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Policy 04.32 AP.111 was revised December 2025 to include the following for contract vendors with aggregate amounts \$100,000 and greater—a review of contract performance is required as well as either: a. A strategic investment review cycle every three years (for recurrent contracts), or b. An implementation quality review (for nonrecurrent contracts), or c. A service delivery review (for limited or short-term contracts).

Corrective Action Planned

JCPS will incorporate data-based evidence of implementation, outcomes, effectiveness, and ROI into the budgeting and investment review process. Through the Strategic Investment Cycle Review, selected investments will undergo evaluability screening, establish KPIs and outcome measures, and be reviewed for performance and cost-effectiveness. The resulting evidence will be used to inform decisions regarding continued funding, modification, expansion, or discontinuation of investments.

The Finance Division and ARSI will jointly support this process. ARSI will conduct evaluability assessments and work with project leads to establish logic models, KPIs, outcome measures, and ROI metrics. Finance will maintain expenditure information and incorporate performance and ROI findings into the District's budgeting and investment decision-making process.

SIMS will serve as the recurring monitoring mechanism for selected strategic investments. Project leads will provide annual KPI updates, and ARSI and Finance will review performance and expenditure data. Strategic investments with sufficient evaluability will undergo a three-year ROI review, with findings summarized to inform future funding decisions.

Target Completion Date: September 2027—Completion of the first annual investment review cycle and establishment of the associated Board/public reporting process

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 4.7

JCPS does not have a current strategic plan that allows for alignment of spending decisions to District priorities.

Recommendation 4.7.a

JCPS should develop budgeting priorities in alignment with an established District strategic plan.

Implementation Status: Not Implemented

Corrective Action Planned

An effective strategic plan should serve as the foundation for Districtwide resource allocation and budget development. Aligning budgeting priorities with clearly established strategic goals will strengthen the District's ability to ensure that financial resources are directed toward initiatives that have the greatest potential to improve student outcomes and advance District priorities.

As the District establishes and implements its strategic plan, JCPS will develop a systematic process to connect strategic priorities to the annual budget development cycle. Budget requests will be reviewed through this strategic alignment lens to promote consistency, transparency, and accountability in resource allocation.

The District will establish mechanisms for monitoring the ROI of strategic investments, including reviewing budget expenditures alongside established performance measures and using data to determine whether investments are producing the intended outcomes. Resources will be adjusted to address emerging needs, improve program effectiveness, and ensure that funding remains aligned with the District's strategic direction.

The District will continue to strengthen communication among the Superintendent's office, Cabinet, departments, schools, and the Board so that budget decisions are clearly communicated to stakeholders.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Superintendent's Office; Thomas Aberli, Executive Officer Finance; Katy DeFerrari; Chief of Strategy and Innovation; District Cabinet

Operational Lead / Owner: Katy DeFerrari, Chief of Strategy and Innovation

Finding 4.8

The Contingency Fund, 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.

Recommendation 4.8.a

JCPS should bring contingency fund levels back to the minimum KDE recommended levels of 5% of the total budget.

Implementation Status: Fully Implemented

Corrective Action Already Taken

No action necessary. The District already meets established criteria.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Jason Detre, Executive Director Budget

Finding 4.9

JCPS has relied on the Fund Balance to cover expenditures that exceed revenues.

Recommendation 4.9.a

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 contingency funds and unassigned funds in the Beginning Fund Balance.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Fund Balance and Cash Flows have been discussed with the Board during Board meetings in April 2026 and May 2026.

Corrective Action Planned

Finance will provide quarterly updates to the Board via the Monthly Finance Reports submitted to the Board as well as presentations throughout the year. Policy 04.1 may be revised to include target Fund Balance and Cash in Bank minimum standards for July 1 as well as forecasted minimum Cash and Investments for November of each fiscal year. Criteria for use of the District contingency can also be established in Policy 04.1.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 4.9

JCPS has relied on the Fund Balance to cover expenditures that exceed revenues.

Recommendation 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 spend down funds prior to each fiscal year end.

Implementation Status: Not Implemented

Corrective Action Planned

There is no reference to Carryover funds in either Board Policy or the JCPS Allocation Standards. The concept of allowing schools to carry over flexible focus funds is an unwritten administrative practice. Finance and Academics will collaborate with the Superintendent on intended purposes for allowing Carryover of flex funds as well as any maximum cap. Carryover has been approved for 2026-27 (that is, school flex Carryover remaining from the year 2025-26); a new memo will accompany the allocation of Carryover funds that outlines acceptable uses.

Target Completion Date: June 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Jason Detre, Executive Director Budget

Finding 4.10

JCPS expenditures exceeded revenues during the examination period of FY22–26, with a budget deficit that reached \$295M in FY25.

Recommendation 4.10.a

JCPS should develop and present balanced budgets to the Board in which expenditures do not exceed revenues.

Implementation Status: Not Implemented

Corrective Action Already Taken

Finance presentations to the Board in April and May discussed the measures associated with defining a “balanced” District budget. According to the Kentucky Department of Education (KDE), the JCPS budget has always been balanced according to the letter of the law.

Corrective Action Planned

The Board must detail the metrics associated with a policy-driven “balanced budget” and update Board Policies 04.0 or 04.1 accordingly. Budget reports must align with these metrics.

Target Completion Date: January 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 4.11

The Board policy on budget control responsibility lacks specificity in roles and responsibilities and decision-making authority.

Recommendation 4.11.a

JCPS should update JCBE Policies 04.1 and 04.31 to clarify budget-related roles and responsibilities and decision-making authority.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Policy 04.1 was revised to define responsibilities of the Superintendent, Finance Office, and Board of Education.

Corrective Action Planned

Policy 04.1 must be further revised to define the decision-making authority of the Superintendent, Finance Office, and Board of Education.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 4.12

JCPS does not have established procedures and controls related to budget roles and responsibilities and decision-making authority.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Already Taken

JCPS has created the ITS as an infrastructure to facilitate the approval process.

Corrective Action Planned

A formalized procedure for new budget requests, including Organization Chart changes resulting in expense increases, must be established and communicated to all Chiefs.

Target Completion Date: January 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

When expenses are added to the District budget that reduce the Contingency, these expenses must be entered into the ITS, journaled in MUNIS Contingency account, reported in the Monthly Financial Report to the Board, and recorded in the appropriate Draft/Tentative/Working Budget Reports.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 4.14

JCPS Finance staff faced barriers to direct communication with the Board regarding changes to the budget.

Recommendation 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 and staff leaders and the Board. These changes should be outlined in updated standard operating procedures.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Tentative Budget Reports and Working Budget Reports contain itemized lists of significant changes that occurred between each Report.

Corrective Action Planned

Fiscal Management Policy 04.1 can be revised to include explicit directions as provided in the 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” and “to increase transparency to the Board and open channels of communication between Finance and staff leaders and the Board.”

Target Completion Date: January 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

Finding 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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The JCPS Superintendent and the Board remain in compliance with KRS 160.550 per KDE for the fiscal years 2022 through 2026. Under KDE’s interpretation of the law, Carryforward funds are considered part of District revenue for any given year. This is logical, since if a District is never allowed to spend more than it collects in revenue in a given year, it would be functionally impossible for the District to accumulate the fund balance and Carryforward funds needed to responsibly manage cash flow.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Kevin Brown, General Counsel

Finding 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.

Recommendation 4.16.a

The Board should pursue school finance training beyond the required schedule and participants mandated by Kentucky state law.

Implementation Status: Not Implemented

Corrective Action Already Taken

Finance presentations to the Board in April and May focused on the training of general concepts related to short-term and long-term implications of JCPS fiscal decision making and budgeting.

Corrective Action Planned

Fiscal Management Policy 04.1 can be revised to include specific, mandatory finance trainings throughout the year.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

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.

Recommendation 4.17.a

The Board should pursue regular communication with Internal Audit.

Implementation Status: Fully Implemented

Corrective Action Already Taken

Internal Audit communicates with Board members through quarterly reporting and quarterly meeting invitations. At a minimum, each Board member meets individually with Internal Audit on an annual basis, with several Board members meeting more frequently.

Target Completion Date: August 1, 2026

Accountable Chief / Division: Board of Education; May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

Recommendation 4.17.b

The Board should continue to use ARMAC in its advising capacity as a process to the Board on key risk management processes, including the District budget process.

Implementation Status: Partially Implemented

Corrective Action Already Taken

ARMAC recently attended a Board meeting to discuss the District budget and is available to advise the Board on the budget process upon request. Internal Audit has also established a twice-annual Board reporting cadence (see Recommendation 3.4a) that includes budget-cycle-aligned presentations.

Corrective Action Planned

Continued and formalized use of ARMAC's advising capacity on the budget process will be codified through the ARMAC Charter amendments addressed in Recommendations 4.17.c and 4.17.d.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Board of Education; May Porter, Director of Internal Audit

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The ARMAC Charter will be amended to explicitly include the District budget process as a standing, annual ARMAC focus area. This amendment will be developed and adopted alongside the other ARMAC Charter amendments arising from related Chapter 3 recommendations (see Recommendations 3.3a, 3.4a, and 3.5a) as part of a single, consolidated set of charter revisions.

Target Completion Date: December 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit; Tom Aberli, Interim Executive Officer Finance; Kevin Brown, General Counsel

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

Internal Audit has established a twice-annual Board presentation structure (see Recommendation 3.4a)—an October presentation coinciding with the Annual Financial Audit and Working Budget discussion and a May presentation aligned with the Tentative Budget review cycle.

Target Completion Date: October 1, 2026

Accountable Chief / Division: May Porter, Director of Internal Audit; Tom Aberli, Interim Executive Officer Finance; Kevin Brown, General Counsel

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

Recommendation 4.17.e

The Board should leverage the new Board member ARMAC liaison role as a communications channel between the committee and the Board.

Implementation Status: Partially Implemented

Corrective Action Already Taken

A Board member was assigned in fall 2025 to serve as a liaison to ARMAC (see Recommendation 3.3a), attending ARMAC meetings and providing informal communication back to the full Board.

Corrective Action Planned

Continued and increased use of this liaison role as the Board's primary communications channel with ARMAC will be formalized through the Board Policy 4.9 amendment and ARMAC Charter amendment addressed in Recommendation 3.3a.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Board of Education; Kevin Brown, General Counsel

Operational Lead / Owner: May Porter, Director of Internal Audit

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.

Recommendation 4.18.a

JCPS financial reporting documents and presentations should be updated to include consistent, defined terminology and budget categories while maintaining KDE compliance.

Implementation Status: Partially Implemented

Corrective Action Already Taken

A General Fund Dashboard has been created for historical (2025-26) and current (2026-27) disaggregation of data to improve transparency and understanding. The new-year Dashboard will be ready after September 1, after the Working Budget is locked down. The Dashboards (last year's and this year's) will be shared with the Board at the September 1 Board meeting, aligning with the Working Budget discussions.

Corrective Action Planned

Include General Fund Dashboard results in Board meetings, Budget Reports, and training videos.

Target Completion Date: October 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Thomas Aberli, Interim Executive Officer Finance

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

A General Fund Dashboard has been created for historical (2025-26) and current (2026-27) disaggregation of data to improve transparency and understanding.

Corrective Action Planned

Include General Fund Dashboard results in Board meetings, Budget Reports, and training videos. Correlate these results with weekly monitoring of Cash Flows.

Target Completion Date: November 1, 2026

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Cecil Comstock, Executive Director Accounting

Finding 4.19

There are gaps in information and a lack of transparency regarding roles, decision-making, and financials between JCPS, JCBE, and JCPEF.

Recommendation 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).

Implementation Status: Not Implemented

Corrective Action Already Taken

The Jefferson County Public Education Foundation (JCPEF) is a private, tax-exempt charity (a 501[c][3] non-profit organization). According to the JCPEF webpage, its purpose is 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.”

As a 501(c)(3) organization, the JCPEF Board is entirely independent from the District, Superintendent, and the Jefferson County Board of Education (JCBE) regarding “funding strategy, fund management, and decision making.” This role definition is and has always been clear—the JCPEF Board (consisting of volunteer business and civic leaders) has sole decision-making authority over fundraising, investment strategies for its funds, and funding priorities.

That said, the JCPEF Board engages in extensive discussions with the Superintendent regarding funding priorities to ensure alignment of their funding decisions with the strategic priorities of the JCBE and Superintendent. Those clear and extensive communications led to detailed written agreements between the JCPEF Board and the JCBE.

As strategic priorities change over time, funding priorities also change, which is reflected by the JCBE having approved three succeeding MOUs with the JCPEF Board regarding the use of the \$20 million gift from MacKenzie Scott. The MOUs provide detailed information regarding funding allocations over numerous years (through 2028) to be provided to the District using funds under the control of the JCPEF. The original MOU was effective October 9, 2022; the amended and restated MOU was effective February 1, 2024; and the amended and restated MOU was effective June 9, 2026.

These documents are publicly available on the JCPS website in JCBE meeting materials. Additional transparency is provided by a standing agenda item on the Consent Calendar of every regular JCBE meeting, delineating donations received by the District from the JCPEF as well as the original donors.

The JCPEF Board has no staff, so the District has opted to provide administrative support, which includes staffing meetings and managing correspondence with donors and grant recipients.

While MacKenzie Scott funds and other JCPEF funds are visible to JCPS Finance staff within MUNIS, the District does not control the investment, allocation, or disbursal of these funds. The management of the funds and how they are invested is handled by Robert W. Baird and Co, Inc., the company selected by the JCPEF Board for that purpose. The allocation of funds to JCPS is based entirely on the MOU approved by the respective boards. Disbursal of funds in accordance with established disbursement procedures within the MOU occurs when JCPS submits an invoice to the JCPEF. JCPEF reviews the invoice for appropriateness based on the provisions of the MOU and, once approved, cuts an electronic check to the District. This segregation of responsibilities and clear role definition provides for strong checks and balances.

Corrective Action Planned

The Superintendent and Board have engaged the American Association of Schools Administrators to facilitate a comprehensive strategic planning process. After the strategic plan has been finalized and approved by the Board, the Superintendent will make a presentation to the JCPEF Board outlining the strategic priorities for the District set forth in the strategic plan. That will be an appropriate time for the JCPEF Board to consider possible changes to its funding priorities to better align with the goals and strategies in the strategic plan. Any such changes would be memorialized in a revised and restated MOU.

Target Completion Date: August 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Katy DeFerrari, Chief of Strategy and Innovation

Finding 4.19

There are gaps in information and a lack of transparency regarding roles, decision-making, and financials between JCPS, JCBE, and JCPEF.

Recommendation 4.19.b

JCPS and JCPEF should collaborate on opportunities to increase transparency and publicly available information related to strategy, impact, and financials.

Implementation Status: Not Implemented

Corrective Action Already Taken

The District hosts a webpage on the JCPS website for the JCPEF. It describes the purpose of the JCPEF, lists the Board of Directors, and describes some past and current initiatives funded by the JCPEF.

Corrective Action Planned

The District will work with the JCPEF to expand the information provided on the webpage to include, but not be limited to: a quarterly report of disbursement of funds from the JCPEF to the District; IRS 990 forms for the current year and the past three years, describing revenue, expenses, and programs; the MOU detailing current spending priorities for MacKenzie Scott Funds; and an annual impact report to include donors to the JCPEF, a description of the alignment between JCPEF donations and District strategic priorities, funds raised and fund disbursed, cost-per-student impacted, academic/well-being outcome data for key programs, and major donor recognitions.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Katy DeFerrari, Chief of Strategy and Innovation

Finding 4.19

There are gaps in information and a lack of transparency regarding roles, decision-making, and financials between JCPS, JCBE, and JCPEF.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The current MOU, which revised and restated the previous MOU, was approved by the JCBE and the JCPEF Boards, effective June 9, 2026. The MOU provides detailed information regarding allocation of all MacKenzie Scott funds.

After the strategic plan has been finalized and approved by the Board, the Superintendent will make a presentation to the JCPEF Board outlining the strategic priorities for the District set forth in the strategic plan. That will be an appropriate time for the JCPEF Board and the JCBE to consider possible changes to funding priorities to better align with the goals and strategies in the strategic plan. Any such changes would be memorialized in a revised and restated MOU.

The annual Impact Report described in response to Recommendation 04.19.b will be the means by which the District and the JCPEF can communicate how spending plans align with District strategic goals and priorities, how funds have been spent, related student outcomes, and other KPIs.

As a private, tax-exempt charity, the JCPEF Board (consisting of private business and civic leaders) is entirely independent from the District, Superintendent, and the JCBE. The JCPEF Board has sole decision-making authority over fundraising, investment strategies for its funds, and funding priorities.

The Auditor of Public Accounts Special Report makes recommendations to the District based on a series of findings and observations. The District is obligated to respond to those recommendations and prepare a Corrective Action Plan. The District cannot, however, require the JCPEF to take any action based on the recommendations of the Auditor's Special Report. The JCPEF reports financial information as required by law through IRS 990 forms. Any decision to provide further information, including projections of returns on investments conducted by a financial advisor, is entirely at the discretion of the JCPEF Board and is beyond the scope of the Corrective Action Plan based on the Special Report.

Corrective Action Planned

The MOU with the JCPEF pertaining to the utilization of MacKenzie Scott funds will be reconsidered by May 30, 2027, after completion of the new strategic plan and subsequent discussions between the Superintendent and the JCPEF Board. All changes to the MOU will need to be approved by the JCBE and the JCPEF Board.

Target Completion Date: May 1, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Katy DeFerrari, Chief of Strategy and Innovation

Chapter 05: Talent and Retention

Finding 5.1

The District must continue its efforts to reduce its teacher shortage.

Recommendation 5.1.a

The District's Recruitment Department should continue employing targeted efforts to reduce teacher vacancies.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Talent Department will monitor and publicly report each quarter.

Corrective Action Planned

The Recruitment Department will implement a formal, data-driven targeted recruitment procedure that prioritizes hard-to-fill certification areas, high-vacancy schools, and underrepresented candidate groups. The procedure will include vacancy forecasting, targeted outreach campaigns, accelerated candidate screening, recruitment partnerships, and vacancy-reduction benchmarks.

The Director of Recruitment will oversee implementation, with recruitment staff assigned responsibility for specific certification areas, schools, candidate pipelines, and external partnerships. School leaders and Talent Division staff will support candidate selection, placement, and hiring.

The Director of Recruitment will conduct a monthly vacancy reconciliation review comparing position-control data, applicant-tracking data, and school-reported vacancies. Results will be documented on the Talent Dashboard and reviewed quarterly by the Executive Officer Talent to assess progress against vacancy-reduction targets, identify persistent gaps, assign corrective actions, and verify completion at the next review.

Target Completion Date: November 1, 2026

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Edris Humphrey, Director Recruitment

Finding 5.2

The District continues to experience shortages and vacancies in classified positions, which affect operations at both the school and District levels.

Recommendation 5.2.a

The District should review classified job duties and pay to address ongoing shortages.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS conducted a Market-Based Pay Analysis for Job Family II (grades 4–7), 1A, 1B, and Foreman Plumbing positions.

Corrective Action Planned

The District will conduct a comprehensive review of classified job duties, minimum qualifications, workload expectations, and compensation for positions experiencing persistent shortages and will revise job descriptions, salary schedules, or staffing practices when supported by the findings. The Compensation Department will lead the review in collaboration with Recruitment, Employee Services, Finance, operational department leaders, and applicable bargaining units. To ensure ongoing implementation, Compensation will complete an annual market

and internal-equity review of hard-to-fill classified positions, while the Talent Division will conduct quarterly vacancy and turnover reviews to identify emerging concerns, assign corrective actions, and document completion through the District's Talent Dashboard.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jacob Davis, Director Compensation and Classification

Finding 5.3

The District does not have a formal procedure for auditing, updating, and posting all job descriptions to the public portal.

Recommendation 5.3.a

The District should establish a clear process and schedule for regularly reviewing and updating job descriptions. Human Resources should verify all job titles and duties reflect the actual functions being performed, reporting lines are consistent with organizational changes, and update job descriptions as necessary.

Implementation Status: Not Implemented

Corrective Action Planned

The Talent Division will monitor progression on a quarterly Position Management Dashboard.

JCPS will establish a Job Architecture and Position Management Framework that standardizes the creation, review, approval, maintenance, and publication of all District job descriptions.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jacob Davis, Director Compensation and Classification

Finding 5.4

Hiring managers report inconsistent levels of service delivery and support from Human Resources teams with site-based hiring procedures and timelines across the District throughout the year, resulting in delays and inconsistency in identifying and hiring qualified candidates for open positions.

Recommendation 5.4.a

JCPS leadership should work with the Jefferson County Teachers Association (JCTA) to address the annual timing of the District's hiring windows to ensure maximum staffing efficiency and effectiveness.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS will continue collaborating with JCTA in a spirit of partnership to evaluate the effectiveness of the current transfer and hiring timeline and identify mutually beneficial opportunities to improve staffing efficiency while preserving employees' contractual rights.

Corrective Action Planned

JCPS will develop a collaborative staffing process that honors negotiated employee rights while enabling JCPS to recruit, select, and hire highly qualified educators as early and efficiently as possible.

Target Completion Date: August 1, 2028

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Stephanie White, Executive Director Labor Management and Employee Relations

Finding 5.4

Hiring managers report inconsistent levels of service delivery and support from Human Resources teams with site-based hiring procedures and timelines across the District throughout the year, resulting in delays and inconsistency in identifying and hiring qualified candidates for open positions.

Recommendation 5.4.b

The Personnel Services Department should implement policies and procedures consistently across all assigned zones, ensuring equitable support for hiring managers and employees.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Talent works to provide every hiring manager with timely, consistent, equitable, and high-quality Talent support.

Corrective Action Planned

The Talent Division will monitor through a quarterly Service Excellence Dashboard.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sheree Thompson, Executive Director Personnel

Finding 5.4

Hiring managers report inconsistent levels of service delivery and support from Human Resources teams with site-based hiring procedures and timelines across the District throughout the year, resulting in delays and inconsistency in identifying and hiring qualified candidates for open positions.

Recommendation 5.4.c

Human Resources 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS will continue consistent and compliant pre-employment screening.

Corrective Action Planned

JPCS will ensure that every employment recommendation is based upon verified qualifications and completed pre-employment requirements so that only fully qualified candidates are eligible for employment with JCPS. The District will standardize screening procedures across all divisions and employee groups.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sheree Thompson, Executive Director Personnel

Finding 5.4

Hiring managers report inconsistent levels of service delivery and support from Human Resources 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

JCPS Talent Division will revise its zone-based staffing assignment procedure to include a formal review of workload, vacancy volume, and processing times before and during peak hiring periods. This action to be completed by June 30, 2027.

JCPS will also implement a staffing-capacity review process to identify zones experiencing unusually high hiring volume and temporarily reassign Talent Division staff or provide cross-zone support when established workload thresholds are exceeded. This action will be completed on or before June 30, 2027. Evidence will include a “Peak Hiring Period Staffing Coverage Plan,” workload reports by zone, and written records of temporary staffing reassignments.

JCPS will establish service standards for processing applications, verifying credentials, clearing candidates, and responding to site-based hiring managers during high-volume hiring periods. This action will be completed on or before June 30, 2027. Evidence will include the “HR Hiring Process Service Standards,” system-generated processing-time reports, and the HR dashboard used to monitor compliance by zone.

JCPS will institute recurring workload-review meetings during peak hiring periods to monitor service levels, identify processing delays, and assign corrective actions. This action will be completed on or before June 30, 2027. Evidence to include a “Peak Hiring Workload Review Schedule,” meeting agendas and minutes, documented corrective-action logs, and follow-up reports showing resolution of identified delays.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sheree Thompson, Executive Director Personnel

Finding 5.4

Hiring managers report inconsistent levels of service delivery and support from Human Resources 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.

Recommendation 5.4.e

The District should assess ATS access levels for hiring manager assistants to prepare for site interviews.

Implementation Status: Not Implemented

Corrective Action Planned

JCPS Talent will review its zone-based staffing assignments and revise the staffing coverage procedure to distribute hiring workloads more evenly during peak hiring periods. This action will be completed on or before December 31, 2026. Evidence will include the “Zone-Based Staffing Assignment and Peak Hiring Coverage Procedure,” the revised zone-assignment roster, workload reports by zone, and records of temporary staff reassignments.

JCPS Talent will standardize its support procedures and service timelines for site-based hiring managers across all zones. This action will be completed on or before December 31, 2026. Evidence will include a “Site-Based Hiring Manager Support and Service Standards,” establishing consistent timelines for application review, candidate clearance, interview support, offer processing, and responses to hiring-manager inquiries.

JCPS Talent will implement a monitoring system to track service delivery, processing times, and unresolved hiring requests by zone. This action will be completed on or before December 31, 2026. Evidence will include an HR service-delivery dashboard, ATS processing-time reports, zone-level workload reports, and corrective-action logs documenting how identified delays were resolved.

JCPS Talent will assess Applicant Tracking System (ATS) access levels for designated hiring-manager assistants and revise the system-access procedure to permit role-appropriate access for interview preparation while protecting confidential applicant information. This action is to be completed on or before December 31, 2026. Evidence to include the “ATS Role-Based Access Assessment,” the revised “ATS User Access and Confidentiality Procedure,” the approved access-level matrix, and system-configuration screenshots.

JCPS Talent will provide training to hiring managers and designated assistants on site-based hiring procedures, required timelines, ATS functions, candidate confidentiality, and interview preparation. This action will be completed on or before March 1, 2027. Evidence to include “Site-Based Hiring and ATS Training Materials,” training schedules, participant attendance records, user-access acknowledgments, and completed confidentiality agreements.

Target Completion Date: March 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sheree Thompson, Executive Director Personnel

Finding 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.

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.

Implementation Status: Partially Implemented

Corrective Action Planned

JCPS will provide every new Teacher with a consistent, high-quality induction and mentoring experience that accelerates professional growth, strengthens instructional effectiveness, improves Teacher retention, and enhances student learning. The Executive Officer Talent will work with the Executive Director Policy and Systems to develop a formal New Teacher Induction and Mentor Program Policy.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jonathan Lowe, Executive Director Policy and Systems

Finding 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.

Recommendation 5.6.a

The District should further invest in biannual classified staff retention surveys to better track trends and inform retention efforts.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Annual classified employee surveys already exist.

Corrective Action Planned

JCPS will develop a comprehensive employee retention system that uses timely, actionable workforce data to improve employee engagement, reduce turnover, strengthen organizational culture, and position JCPS as an employer of choice. Annual classified employee surveys will now become biannual. The use of exit interviews will continue.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Stephanie White, Executive Director Labor Management and Employee Relations; Jasmine Drinkard, Assistant Director Labor Management and Employee Relations

Finding 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.

Recommendation 5.6.b

Human Resources should revise the District's exit survey for all employees to include targeted questions about why employees leave, making the data useful for retention.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Regarding the use of standardized exit surveys, JCPS revised the District Exit Survey to strengthen retention data collection and address the gaps identified in APA Recommendation 5.6.a. This corrective action was completed in June 2026, following a full review and redesign led by the Office of Retention. The survey was updated to include promotion and demotion pathways, wellness-related support options, neutral and psychologically safe language, expanded demographic categories, and a significantly broadened equity section addressing racialized workload, microaggressions, advancement access, mentorship, evaluation bias, and psychological safety. The redesign also incorporated Opportunity and Access (formerly Diversity, Equity, and Poverty) O&A into central office support tracking. Evidence of completion includes the final revised 2026 Exit Survey, Racial Equity Analysis Protocol (REAP) documentation completed with Talent and O&A, and draft-to-final revision records demonstrating the incorporation of all recommended changes.

Corrective Action Planned

JCPS will develop a comprehensive exit feedback system that provides meaningful workforce intelligence, identifies the root causes of employee turnover, and informs strategic decisions to improve employee retention across all employee groups.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Stephanie White, Executive Director Employee Management and Employee Relations; Jasmine Drinkard, Assistant Director Retention and Engagement

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.

Recommendation 5.7.a

The District should procure and implement a comprehensive electronic performance management system to streamline employee evaluation procedures districtwide.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS will continue use of standardized Districtwide evaluation processes.

Corrective Action Planned

JCPS will implement a secure, Districtwide electronic performance management system that supports consistent, efficient, data-informed employee evaluations while strengthening professional growth and organizational effectiveness across all employee groups.

Target Completion Date: July 1, 2028

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Stephanie White, Executive Director Labor Management and Employee Relations

Finding 5.8

The District does not have a standardized policy for funding stipends to teachers whose classroom enrollment exceeds the student limits established in school-based budgets.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS will review staffing vs. enrollment numbers.

Corrective Action Planned

JCPS will develop a comprehensive Class Size and Overage Management Framework that ensures equitable staffing, consistent application of overage compensation, responsible fiscal management, and optimal learning conditions for students.

Target Completion Date: July 1, 2028

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jacob Davis, Director Compensation and Classification

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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS has begun construction of a comprehensive compensation study to evaluate Teacher salaries, market competitiveness, and long-term compensation sustainability.

Please note that this finding is based on an interactive chart with no reference or investigation of the underlying data in the National Center for Education Statistics Common Core of Data. A review of the actual data reveals that three-fifths to two-thirds of the increase in District revenue came from three fund sources: 1. State On-Behalf Payments to cover pension and health insurance payments; 2. State payments for capital and debt service costs; and 3. Federal funds for specific program areas. (Note that the 2022 Fiscal Year also includes significant federal funds related to the response to the COVID-19 pandemic.) The funds received in all of these areas cannot legally, and should not responsibly, be spent on Teacher salaries.

Regarding the increase in Teacher salaries, the interactive chart specifically states that the numbers have been adjusted for inflation, so the raises have been keeping up with the cost of living in that methodology. In addition, keep in mind that Teacher salaries are collectively bargained. It should also be noted the District has invested in a number of areas required by state and federal law (e.g., Exceptional Child Education [ECE] staff, Professional Development [PD]).

Corrective Action Planned

JCPS will develop and implement a competitive, equitable, and sustainable Teacher compensation system that positions JCPS as an employer of choice while supporting the recruitment, development, and retention of highly effective educators.

Target Completion Date: July 1, 2028

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jacob Davis, Director Compensation and Classification

Finding 5.10

JCPS has the highest ratio of school administrators per student among districts with similar student enrollment numbers.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS will analyze how best to reduce administrative staff without interfering with student success.

Corrective Action Planned

JCPS will develop a data-informed leadership staffing model that aligns administrative resources with student needs, school complexity, operational demands, and long-term financial sustainability while strengthening instructional leadership across the District.

Please note that the National Center for Education Statistics (NCES) data used for this finding includes both school-level and District-level administrators, so it does not speak to the question of whether the District has too many District-level administrators for a District the size of JCPS. Using the same NCES data, JCPS had the lowest District-administrator-to-student ratio of the peer Districts cited. This aligns with KDE data, which shows that JCPS has a relatively low number of District-level administrators and a relatively high number of school-level administrators.

Target Completion Date: July 1, 2028

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Jacob Davis, Director Compensation and Classification

Chapter 06: Operations and Technology

Finding 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.

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.

Implementation Status: Not Implemented

Corrective Action Planned

The JCPS Operations Division will review and clarify the reporting relationship between the Executive Director for Facility Maintenance, Renovations, and Property Management Services and the Executive Director for Operations Services to ensure alignment between operational practices and documented organizational structures. The division will update applicable organizational documentation and communicate the clarified reporting structure to affected staff, as appropriate.

Target Completion Date: September 30, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 6.2

JCPS's facility plan documents are not clearly aligned.

Recommendation 6.2.a

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The 2026 FPI, completed in June, now includes the next scheduled DFP date for each school identified as a Critical Category.

Target Completion Date: June 30, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Amy Stokes-Levine, Director Operations Leadership and Procedural Development

Finding 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.

Recommendation 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.

Implementation Status: Alternative Action

Alternative Action

As stated in its report, the Facilities Profile Index (FPI) serves as a planning resource that provides contextual data and recommendations to inform decision making; however, it is not a decision-making body or the final authority on these actions. Therefore, alignment with all FPI recommendations cannot be guaranteed, as final decisions are based on multiple factors considered by the Superintendent and Board of Education.

Corrective Action Planned

Capital improvement plans and decisions regarding school closures, consolidations, and relocations are made through the established governance process involving the Superintendent and the Board of Education and are informed by community engagement and stakeholder feedback. The FPI will continue to be considered as one of multiple factors in the Superintendent's and Board of Education's decision-making process.

To increase transparency regarding decisions on major school closures, consolidations, or relocations resulting from future FPI reports, JCPS will publish a follow-up report summarizing the impacts of those decisions on each Board of Education District.

Target Completion Date: May 31, 2027

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Dr. Brian Yearwood, Superintendent; Jefferson County Board of Education

Finding 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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The 2026 FPI, completed in June, includes a new section that provides a comprehensive summary of facility improvement efforts categorized by Board District area.

Target Completion Date: June 30, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Amy Stokes-Levine, Director Operations Leadership and Procedural Development

Finding 6.4

JCPS lacks a transparent deferred-maintenance master plan to manage the backlog of maintenance needs postponed due to budget constraints.

Recommendation 6.4.a

JCPS should develop a master deferred maintenance plan that prioritizes transparency in repairs, estimated costs, and funding strategy.

Implementation Status: Not Implemented

Corrective Action Planned

During FY 2026-27, JCPS will analyze and evaluate its deferred maintenance process with the goal of developing and publishing a comprehensive deferred maintenance plan by June 30, 2027.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: John Niehoff, Executive Director Facility Planning and Design

Finding 6.5

School building age varies widely by Board District.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

To increase transparency regarding decisions on major school closures, consolidations, or relocations resulting from future FPI reports, JCPS will publish a follow-up report summarizing the impacts of those decisions on each Board of Education District. The first follow-up report would be expected by May 2027, following Superintendent and Board decisions in spring 2027.

Target Completion Date: May 31, 2027

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Amy Stokes-Levine, Director Operations Leadership and Procedural Development

Finding 6.5

School building age varies widely by Board District.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The location of a school building is considered part of the demographic analysis. The age of a school building as a standalone data point is moot as many buildings have been extensively renovated, thus the consideration of KDE's Condition Index, which already takes the age and maintenance history into account. Finally, the DFP captures the outstanding repair needs, which have always been a consideration and have already been added to the official 2026 FPI Report to communicate its reference and consideration.

Target Completion Date: June 30, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Amy Stokes-Levine, Director Operations Leadership and Procedural Development

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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

We continue to annually monitor under-enrollments through several methods, such as developing enrollment projects, the FPI analysis, and Tenth-Day Counts.

Target Completion Date: June 3, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Brent West, Executive Director Geographic Information Systems

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.

Recommendation 6.6.b

JCPS should analyze schools on the cusp of the optimal capacity boundaries to further identify areas for resource optimization.

Implementation Status: Fully Implemented

Corrective Action Already Taken

This District continues to annually monitor optimal capacity enrollments through several methods, such as developing enrollment projects, the FPI analysis, and Tenth-Day Counts.

Target Completion Date: June 30, 2026

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Brent West, Executive Director Geographic Information Systems

Finding 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.

Recommendation 6.7.a

JCPS should develop a funded Chromebook repair-and-replacement cycle to sustain 1:1 devices for students.

Implementation Status: Partially Implemented

Corrective Action Already Taken

To address the repair cycle for Chromebooks, the Technology Division implemented a reorganization of jobs and positions, moving the responsibility of Chromebook repair. The new team structure and reorganization created six jobs dedicated to Chromebook and laptop repair, which has addressed the slower repair cycle of previous years. The change in this organizational structure went into effect on July 1, 2026. Since that time, this new team has increased Chromebook repair completion and created new systems for the repair structure to address more repairs in a shorter time span. We will monitor the Chromebook repair cycle moving forward to document how these new systems have improved the overall cycle for repairs.

Corrective Action Planned

The Director of Support and Delivery and the Logistics Coordinator continue to innovate the Chromebook repair process to ensure that the six Computer Lab Technicians have adequate space, supplies, and support to improve the repair cycle. Additionally, the Technology Division has acquired additional budget funds to replace aging and broken-beyond-repair devices. We will monitor the repair cycle and replacement cycle using Incident IQ, our technology repair and support system.

Target Completion Date: January 15, 2027

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The 2026-27 JCPS District Technology Plan, first drafted on April 15, 2026, directly addresses and accounts for the organizational move of Educational Technology and Library Media Services to the Academics Division. This organizational change allows each division to focus on its core competencies while maintaining a shared vision for digital learning. Moving Educational Technology and Library Media Services to the Academics Division directly aligns instructional technology with professional learning, curriculum design, and classroom engagement.

Corrective Action Planned

To further address the District technology goals of Academics and Technology, these two divisions will establish regularly scheduled joint meetings between leadership to address joint operations like the Student Technology Leadership Program (STLP), student device management, and instructional goals utilizing technology. The Digital Innovation Specialists will work collaboratively with the Technology Division to ensure that District technology goals are maintained.

Target Completion Date: October 15, 2026

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Technology Division currently works with several partners to implement a technology strategy, including Artificial Intelligence (AI), Chromebooks, and instructional technologies. The current partners include KDE's Office of Educational Technology, Forward Edge, a Google-Certified Educational Training group, and Advanced Learning Partnerships. Partnering with these entities, the Technology Division created a *Digital Transformation Handbook*, an AI Implementation Guide, and a District technology plan. Each of these documents was created or updated during the 2025-26 school year.

Corrective Action Planned

The JCPS Technology Division recognizes the changing atmosphere of educational technologies and plans to continue to grow to establish educational technology policies that address Chromebook usage, AI, and classroom instructional technologies in partnership with the JCPS Academics Division. To properly align goals, the Technology Division will continue to work with vendors to establish data governance procedures and alignment with core systems, while working directly with the Academics Division's Educational Technology Specialists to incorporate best practices. This collaboration will include consulting with Advanced Learning Partnerships, Forward Edge, KDE's Office of Education Technology (OET), and an exploration of other leading research on educational technology implementation throughout the 2026-27 school year.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Amy Stokes-Levine, Director Operations Leadership and Procedural Development

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS ARSI Division currently implements the Program Evaluation Standards created by the Joint Committee on Standards for Educational Evaluation. This process covers a majority of data governance procedures and has been established in JCPS since the 2025-26 school year.

Corrective Action Planned

To further address the necessary data governance framework for JCPS, the ARSI Division will collaborate with the Talent Division, Technology Division, and the Financial Services Division to create a common data governance framework that outlines policies, procedures, and roles regarding Infinite Campus, MUNIS, and any other major data sources regarding students and staff.

Target Completion Date: December 1, 2027

Accountable Chief / Division: Marco Muñoz, Accountability, Research, and Systems Improvement; Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS identified the need to evaluate communication-platform adoption as a Districtwide family-engagement and technology-utilization issue. Existing platform usage data, contact information records, and school-level communication practices will be used as baseline information for the formal analysis. The District has not yet completed the full root-cause analysis or approved the resulting action plan; therefore, this finding is reported as partially implemented.

Initial evidence includes available platform usage reports, school communication procedures, contact records, and communications-platform documentation collected by Communications and Community Relations.

Corrective Action Planned

By November 15, 2026, Communications and Community Relations, Information Technology, Data Management, school Principals, and student and family representatives, will complete a structured analysis of low parent and student use of the District's Teacher, parent, and student communication software.

The analysis will examine platform activation, message-delivery and open rates, response rates, demographic and language differences, school-level variation, contact-data accuracy, staff usage expectations, training, accessibility, device and connectivity barriers, and family and student communication preferences. The analysis will also include surveys and targeted focus groups with families, students, Teachers, and school administrators. Results will be documented in a written root-cause analysis that identifies barriers, affected populations, responsible owners, and recommended corrective actions.

After the analysis is completed, Communications and Community Relations will establish a written Communication Software Engagement Action Plan by December 15, 2026. The plan will define a single primary communication pathway; minimum expectations for Teacher, school, and District usage; translated and accessible communication requirements; procedures for correcting contact information; family onboarding practices; student engagement strategies; staff training requirements; and measurable annual and school-level participation targets.

By January 31, 2027, the division and school Principals will implement a recurring dashboard review. The dashboard will be produced monthly at the school and District levels and reviewed quarterly by the responsible Chiefs. It will include activation, successful-delivery, open, and response rates; usage by communication channel; participation by school and language group; and completion of required staff communications. Principals will receive school-specific results and will document corrective steps when their results fall below District-established thresholds.

Each school will designate a communication-platform coordinator by February 15, 2027. The coordinator will verify staff compliance, coordinate family onboarding, assist families with access issues, and submit a monthly certification that required communication procedures were followed. The certification and dashboard review will create a recurring control to prevent isolated schools or individual classrooms from reverting to inconsistent or unapproved communication practices.

Communications will perform a review of the action plan beginning June 30, 2027. The review will compare engagement results with established targets, evaluate whether corrective steps were effective, recommend revisions, and preserve evidence of approval and implementation.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Barnard Baker, Executive Officer Communications and Community Relations

Operational Lead / Owner: Barnard Baker, Executive Officer Communications and Community Relations

Finding 6.11

JCPS's payroll process is inefficient and could lead to errors.

Recommendation 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.

Implementation Status: Alternative Action

Corrective Action Already Taken

Stipends have been reduced per 2026-27 JCBE-JCTA contract, and extra service for certain job classes has been clarified in the Salary Schedule approved July 2026.

Alternative Action

Payroll is processed using the state-required system. Improving payroll processing efficiency resides in reducing the number of stipends, extra service, and deductions that create administrative burden on the administrative processing of payroll.

Corrective Action Planned

As flexible funding continues to diminish, so will the magnitude of extra service and the payroll processing associated with extra service payments. Reducing the number of employee payroll deductions will further improve payroll efficiency.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Thomas Aberli, Interim Executive Officer Finance

Operational Lead / Owner: Jessica Burton, Executive Director

Finding 6.12

Staff reported the District has taken a cautious approach to AI implementation, with a commitment to safety and graduation integration of new technologies.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

In August 2025, the JCPS Technology Division released its AI Implementation Guide. The guide focuses on the phased rollout of Generative AI in the District and aligns with the JCPS instructional vision and prioritizes student's data privacy. The guide also includes a timeline of Generative AI implementation in the District. While this work has been postponed to further align each JCPS division on utilizing Generative AI in the classroom, this work continues to move forward. The Generative AI Implementation Guide can be found on the JCPS website: <https://www.jefferson.kyschools.us/page/generative-ai-in-jcps>.

Corrective Action Planned

The Technology Division plans on continuing the work of the Generative AI Implementation Guide in the 2026-27 school year and adapting the Generative AI Implementation Guide to ensure that the work moves forward properly. To make this implementation work as best as possible, the Technology Division will continue to work with vendors on data privacy and matching our technology inventory to the tools we utilize, while collaborating with all JCPS departments to form a task force for AI implementation that improves teaching and learning.

Target Completion Date: March 1, 2027

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 6.12

Staff reported the District has taken a cautious approach to AI implementation, with a commitment to safety and graduation integration of new technologies.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The JCPS Technology Division recognizes the transformative role of AI in education and agrees with the importance of measuring its impact on instruction and learning. The Technology Division plans to work with the JCPS Generative AI Task Force to maintain AI as a collaboration tool for Teachers and align with state guidelines outlined in the Kentucky Education Technology System (KETS) Master Plan. The Generative AI Task Force will develop an assessment protocol for AI usage and instructional efficacy after its formation.

Target Completion Date: June 1, 2027

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 6.13

JCPS does not have a formal review process in place to ensure IT policies and procedures are up-to-date.

Recommendation 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 best, up-to-date practices.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Technology Division recognizes the need for a formal process to review IT policies and procedures to match up to current industry best practices. Over the last two years, the Technology Division has established a Change Advisory Board (CAB) to discuss and implement technology changes that can affect multiple departments, divisions, and any end users. The establishment of this group has created procedures for instituting changes, and a written charter for how it works could be used to format an annual review of IT policies.

Corrective Action Planned

The JCPS Technology Division will create an annual review of its policies and procedures to ensure compliance with best, up-to-date practices through its current CAB. Using this group of Technology Division stakeholders will allow for a robust conversation that includes each of the departments within this division. The group will review current IT policies affecting the Technology Division and affecting JCPS to ensure that those policies meet expectation standards.

Target Completion Date: June 15, 2027

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Finding 6.14

JCPS gives local administrator rights to too many employees.

Recommendation 6.14.a

JCPS should reduce the number of individuals given local administrator rights to ensure only those that truly need such access are given it.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Technology Division has changed its approach to local administrators on computers since 2025. Beginning in the 2024-25 school year, the Technology Division has implemented the use of Jamf for Mac computers and Intune for Windows computers. Each of these management tools allows for centralized control of software installations and updates, which removes the need for a local administrator on each computer. All computers purchased since the 2024-25 school year have these management systems, which has significantly reduced the number of local administrators on each computer.

Corrective Action Planned

Moving forward, the Technology Division will continue to use Jamf and Intune and a newer management software called Manage Engine, for Windows computers, to continue to create a computer management system that meets the needs of each user without distributing admin rights to more users. This will reduce the cybersecurity risk profile of the District and ensure that any JCPS devices maintain their integrity.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Don Bacon, Interim Executive Officer Technology

Operational Lead / Owner: Don Bacon, Interim Executive Officer Technology

Chapter 07: Bus Safety

Finding 7.1

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

Recommendation 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 for JCPS, not the vendor, and should provide detailed, acceptable justification for using this approach.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS has established procedures governing noncompetitive procurements, which are published in the Purchasing section of the JCPS website. These procedures identify the limited circumstances under which competitive bidding is not required, including emergencies, single-source procurements, licensed professional services, perishable items, replacement parts, items for resale, authorized travel expenditures, purchases resulting in significant savings, and certain insurance contracts. The procedures also outline required documentation, including justification for single-source procurements. More information is available at <https://www.jefferson.kyschools.us/page/purchasing> in the “Determination and Findings Information” section.

Target Completion Date: September 30, 2025

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Wyattte Wynn, Director Purchasing

Finding 7.2

The planning and implementation of three separate, multi-focused initiatives on the same day without input from all affected stakeholders contributed to the transportation issues that occurred on opening day in 2023.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Changes in leadership have increased awareness among District leaders regarding the potential compounding impacts of cross-departmental decisions. Leadership teams are more focused on identifying interdependencies between initiatives and considering how decisions in one area may affect operations, resources, and stakeholders across the District.

Corrective Action Planned

JCPS will develop and implement a contingency planning process to review initiatives that may impact multiple departments or stakeholder groups. The process will incorporate risk assessment, resource allocation, communication strategies, and training considerations to support effective implementation and minimize unintended impacts.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Rob Fulk, Chief Operations Officer

Operational Lead / Owner: Kay DeFerrari, Chief of Strategy and Innovation

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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS agrees with the recommendation and recognizes that attracting and retaining highly qualified employees remains one of the District's highest strategic priorities while noting that portions of the audit require clarification based upon factual discrepancies identified by District staff, including hiring timelines, onboarding responsibilities, tuition reimbursement, and induction program governance. While the District has made measurable progress in reducing Teacher vacancies through enhanced recruitment initiatives, strategic partnerships, targeted hiring events, and streamlined hiring practices, continued innovation is necessary given the increasingly competitive educator labor market. The District also recognizes that Teacher recruitment cannot be viewed as a seasonal Talent activity but rather as a year-round strategic talent acquisition function integrated with workforce planning, employee retention, leadership development, and organizational culture.

Corrective Action Planned

JCPS will revise its employee separation procedure to require all departing employees to complete a standardized exit survey as part of the offboarding process. Evidence of completion will include the revised separation procedure, the standardized exit survey instrument, system records showing survey distribution and completion, and communications informing Supervisors and employees of the new requirement.

JCPS will also establish a recurring process for the Talent Division to analyze exit-survey results by employee group, work location, length of service, and stated reason for departure. This process will be completed by December 31, 2026. Evidence will include the exit-survey data dashboard, written analysis protocols, assigned staff responsibilities, and reports summarizing employee-turnover trends.

Finally, JCPS will implement a quarterly review process through which Talent Division leaders share identified trends with the appropriate departments and develop corrective actions, including Supervisor training, process improvements, and targeted retention strategies. This action will be completed on December 31, 2026. Evidence will include quarterly review meeting agendas and minutes, training materials, attendance records, documented corrective-action plans, and follow-up reports measuring whether the actions improved retention or addressed the concerns identified through the surveys.

Target Completion Date: December 31, 2026

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sheree Thompson, Executive Director Personnel

Finding 7.4

Survey data at the per-school level reflected a concerning level of fear among students who ride the bus to school.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Violence Prevention Team assesses bus stops to determine ones that have a history of community or bus safety issues. They then attend those stops, building relationships, and offering an adult presence to support safety. This was done throughout the school year; the date completed was May 22, 2026.

Corrective Action Planned

The Violence Prevention Team will continue to be present at bus stops as needed. There is a monthly committee that meets to analyze bus discipline, and it includes representatives from Behavior, ECE, and Transportation. This committee will look into the most effective way to utilize District resources to identify contributing factors and propose strategies to decrease student fear. This will be done by November 1, 2026, and the proposal is the evidence.

Target Completion Date: November 1, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Matt Anderson, Executive Director Success and Innovation

Finding 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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The first action taken was to have the Behavior Systems Consultants enter the bus referrals. They went to the bus compounds each day and entered all referrals. This ensured there was consistency in entering and that Bus Drivers felt confident the referrals were entered for schools to address. This was ongoing through the school year, and it was completed by May 22, 2026. In addition, the Consultants created bus behavior briefs to provide ongoing trainings to Bus Drivers and give them strategies throughout the year. This was also completed by May 22, 2026. Finally, a committee met monthly to review bus referral data.

Corrective Action Planned

The Consultants will continue to support Bus Drivers, and the committee will continue monthly meetings to analyze the bus referral data. Evidence will be agenda and minutes from the meetings.

Target Completion Date: May 22, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Matt Anderson, Executive Director Success and Resilience

Chapter 08: Student Supports, Culture and Climate

Finding 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 might reflect how JCPS has structured its student support staffing model.

Recommendation 8.1.a

JCPS should continue to monitor its student support staffing model to ensure that students' mental and behavioral needs are met.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The JCPS ECE Department has established an ongoing process for evaluating its comprehensive student support staffing model to ensure that student mental health, behavioral, and academic needs are addressed through a multidisciplinary approach. Staffing decisions are informed by evaluation timelines, compliance requirements, workload data, student needs, and available resources.

Since 2015, JCPS has increased the number of School Psychologist positions from 34 to 55, a 62 percent increase, while the ECE population increased approximately 8 percent during the same period. To further address workforce shortages and maintain required evaluation timelines, the District supplements staffing through contracted School Psychologists. Additionally, beginning in the 2025-26 school year, the District established a School Psychologist Internship Program approved by the Board of Education to strengthen recruitment and develop a sustainable pipeline of future School Psychologists.

In addition to School Psychologists, JCPS utilizes a comprehensive student support model that includes School Counselors, Mental Health Practitioners, Academic Instructional Coaches, and other specialized staff to provide coordinated academic, behavioral, and mental health supports. This multidisciplinary approach allows School Psychologists to focus on specialized responsibilities, including psychoeducational evaluations, consultation, crisis response, data-based problem solving, and special education eligibility and planning.

Corrective Action Planned

JCPS ECE will continue to annually evaluate student support staffing using workload data, evaluation timelines, student enrollment, service demands, vacancy trends, and available fiscal resources. Staffing recommendations will be adjusted as appropriate to ensure that students continue to receive timely and comprehensive mental health, behavioral, and psychological services.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 8.2

Families and JCPS staff believe the District is insufficiently staffed and resourced to meet student needs.

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.

Implementation Status: Not Implemented

Corrective Action Planned

During the 2026-27 school year, Student Support and Community Engagement will start to examine hiring policies for staff through collaboration with the Talent and Finance Divisions. The planned dates include a milestone check-in on December 9, 2026, with a deadline of the February 2027 Board Meeting if any changes to budget are anticipated.

Target Completion Date: February 27, 2027

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Alicia Averette, Executive Officer Student Support and Community Engagement; Talent Department; and Financial Services Division

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

Beginning in August 2026, across all programs, the work will begin to create a system for implementing consistent administration, monitoring, and evaluation methods. Milestone check-ins are planned for March 9, 2026; December 9, 2027; and May 24, 2028.

Target Completion Date: May 24, 2028

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Alicia Averette, Executive Officer Student Support and Community Engagement; Nathan Balasubramanian, Chief Academic Officer; John Marshall, Chief of Opportunity and Access

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented**Corrective Action Planned**

Beginning in August 2026, leadership from all accountable divisions will start the work to create a system for implementing consistent administration, monitoring, and evaluation methods. All leadership from accountable divisions will create clear ways for all families to learn about available tutoring programs. The team will consider language needs and the best ways to get the information out to stakeholders. The JCPS website will be updated with current information from all departments on one landing page. Milestone check-ins are planned for March 9, 2026; December 9, 2027; and May 24, 2028.

Target Completion Date: May 24, 2028

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Alicia Averette, Executive Officer Student Support and Community Engagement; Nathan Balasubramanian, Chief Academic Officer; John Marshall, Chief of Opportunity and Access

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented**Corrective Action Planned**

Beginning in August 2026, all accountable departments will take steps to create a rubric with a measuring tool to evaluate the value of each tutoring program. Milestone check-ins are planned for March 9, 2026; December 9, 2027; and May 24, 2028. Evidence will be demonstrated through meeting agendas and notes, the rubric, and notes from rubric use to measure ROI.

Target Completion Date: May 24, 2028

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Alicia Averette, Executive Officer Student Support and Community Engagement; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement; John Marshall, Chief of Opportunity and Access

Finding 8.6

Not all School-Based Decision Making Councils are in compliance with KRS 160.345.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The current sample agenda includes a reminder for Principals to identify role groups, facilitating consistent tracking and timely follow-up.

Corrective Action Planned

Beginning July 1, Principals will be reminded when submitting meeting minutes that the role group represented by each attendee must be included alongside the individual's name in the attendance record. Beginning August 1, any meeting minutes submitted without the required role group information will be returned for revision and resubmission. The Specialist Opportunity and Access Support will monitor submissions daily to ensure compliance with this requirement. The collected information will be used to track and verify consistent parent participation. The Specialist Opportunity and Access Support will also follow up with schools experiencing challenges in meeting participation requirements to provide guidance and support as needed.

Target Completion Date: June 1, 2027

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: Shawna Stenton, Specialist Opportunity and Access Support

Finding 8.7

JCPS does not use robust data collection, analysis, or reporting of outcomes for students served through the Community Support Services programs.

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.

Implementation Status: Not Implemented

Corrective Action Planned

Beginning in August 2026, Community Supports will begin the process to track data through robust practices. Milestone check-ins are planned for March 9, 2026; December 9, 2027; and May 24, 2028.

Target Completion Date: May 24, 2028

Accountable Chief / Division: Alicia Averette, Executive Officer, Student Support and Community Engagement; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Ben Langley, Community Support Services Specialist

Finding 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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS provided the Board of Education with a year-end analysis of the cell phone policy implementation on July 21, 2026. Stakeholders were surveyed to determine effectiveness of the new policy and implementation status.

Corrective Action Planned

Cell phone data and stakeholder input was presented to the Board of Education on July 21, 2026. The evidence is the presentation.

Target Completion Date: July 21, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Matt Anderson, Executive Director Success and Resilience

Finding 8.9

JCPS had lower attendance and higher chronic absenteeism than the state average in the 2024-25 school year.

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 both in general and specifically among demographic groups.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS currently employs a comprehensive attendance intervention framework supported by Pupil Personnel, School Social Workers, school-based attendance teams, PowerSchool Attendance Intervention Suite (AIS), Infinite Campus, and documented Attendance Improvement Plans. Student-level interventions, including attendance conferences, Family Engagement Meetings, home visits, community referrals, and individualized attendance plans, are documented and monitored throughout the school year. JCPS will strengthen District-level evaluation by developing standardized reporting that measures intervention implementation, identifies successful practices, and evaluates attendance outcomes across schools and student groups.

Corrective Action Planned

This year, a District-level attendance team will meet bimonthly to analyze attendance data and make recommendations to Principal Supervisors for supports that the team determines would best provide the tools the school needs. These meetings will begin September 2026 and continue through the school year. All recommendations and actions taken will be documented on a spreadsheet to monitor progress.

Target Completion Date: September 30, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Brent Lynch, Director Pupil Personnel; Matt Anderson, Executive Director Success and Resilience

Finding 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 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.

Implementation Status: Not Implemented

Corrective Action Planned

Beginning in August 2026, Community Supports Services will begin the process to track interventions that impact graduation rates of Hispanic students served in Community Support Programs. Milestone check-ins are planned for March 9, 2026; December 9, 2027; and May 24, 2028, when graduation rates are due to KDE.

Target Completion Date: May 24, 2028

Accountable Chief / Division: Alicia Averette, Executive Officer Student Support and Community Engagement

Operational Lead / Owner: Ben Langley, Community Support Services Specialist; Jill Handley, Assistant Superintendent of Instructional Programming; Kim Morales, Regional Assistant Superintendent of High Schools

Finding 8.11

One-fifth of all JCPS students reported feeling “unsafe” at school, according to the exam team’s survey.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS has fully implemented weapons detection systems at all middle and high schools. The implementation of these systems has strengthened the District’s layered approach to school safety and has contributed to a reduction in firearms’ being brought into school buildings.

Each school is assigned both a Risk Assessment Coordinator and a School Resource Officer (SRO). Through the District’s recent reorganization, the Risk Assessment Coordinator role has expanded beyond the previous Safety Administrator model, providing greater support to elementary schools. Under the previous structure, one Safety Administrator could be responsible for supporting up to 25 elementary schools, limiting the frequency of on-site engagement. Under the new model, every school is assigned a Risk Assessment Coordinator and an SRO, with each professional supporting no more than three schools. This significantly increases their presence on campuses and strengthens their ability to build relationships, provide proactive safety support, and respond to school-specific needs.

In addition, the role of the SRO has evolved. Previously, SROs were primarily assigned to middle and high schools during student and staff arrival and responded to schools on an as-needed basis for calls for service. Today, SROs maintain a consistent presence in schools beyond emergency response. They routinely conduct school visits, participate in relationship-building activities, attend school and community events, and are available whenever Principals request their presence to promote positive interactions with students and staff. This proactive approach strengthens partnerships between law enforcement and the school community while fostering a positive school climate.

To further enhance school safety and student well-being, JCPS Police has added four K-9 teams to support District operations. These teams are available for a variety of services beyond their primary operational responsibilities and include a certified therapy dog. Principals may request K-9 visits at any time to support school events, student engagement, crisis response, or other campus activities. These interactions provide valuable opportunities for students and staff to build positive relationships with law enforcement officers and their K-9 partners, helping to foster trust, strengthen community connections, and improve students' overall perception of safety within their schools.

Together, these initiatives reflect JCPS's comprehensive approach to school safety by combining advanced security technology, increased safety staffing, proactive law enforcement engagement, and relationship-centered practices to create safe, welcoming, and supportive learning environments for all students and staff.

Completed actions as of July 1, 2026, were restructuring the JPCS Police Department, redefining the role of the Risk Assessment Coordinator and ensuring that all schools receive their support, increasing visibility of SROs in schools, and the addition of four police K-9 units. Evidence for this is the District organizational charts as well as departmental assignments.

Corrective Action Planned

Target Completion Date: July 1, 2026

Accountable Chief / Division: Todd Kessinger, Chief of Police, Safety and Security

Operational Lead / Owner: Todd Kessinger, Chief of Police; Robert Ritter, Manager Risk Assessment Coordinator Support

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Each middle and high school has an assigned Risk Assessment Coordinator who is responsible for leading and coordinating appropriate staffing for the weapons detection systems. In addition, each school has an SRO present during student and staff arrival. To ensure operational continuity, JCPS will allow trained In-School Security Monitors to conduct secondary searches when the Risk Assessment Coordinator is not on site, provided they have completed the required training.

To support the sustainability of both the equipment and implementation practices, established protocols require that weapons detection systems are powered off and covered, tablets are fully charged, and all equipment is properly secured at the end of each school day. When the equipment will not be used for an extended period, it is relocated to a safe and secure storage location.

To ensure consistent implementation, best practices have been reviewed with Principals, Assistant Principals, Risk Assessment Coordinators, SROs, and other central office staff. Compliance with these practices is monitored through periodic school visits, camera spot checks, and the investigation of any concerns or complaints received. When implementation issues are identified, they are addressed promptly through follow-up training, coaching, and ongoing support to ensure continued fidelity to established protocols. This was implemented July 1, 2026. The agendas from trainings with relevant staff are the evidence for this.

Corrective Action Planned

Protocols for weapons detection utilizing school staff, SROs, and Risk Assessment Coordinators were established by July 1, 2026. School staff and SROs completed their training July 9 and July 17, and the Risk Assessment Coordinators completed their training when they returned to work on July 30, 2026.

Target Completion Date: July 30, 2026

Accountable Chief / Division: Todd Kessinger, Chief of Police, Safety and Security

Operational Lead / Owner: Todd Kessinger, Chief of Police; Robert Ritter, Manager Risk Assessment Coordinator Support

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.

Recommendation 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.

Implementation Status: Alternative Action

Alternative Action

JCPS considered the use of weapons detection systems for after-school events. After evaluating operational, logistical, and financial factors, the District determined that deploying the systems at these events was not the most effective option. Key considerations included the additional staffing required to operate the systems, the challenges associated with moving the equipment to and from event entrances, and the need to recalibrate the units before they could be returned to service for the next school day.

Based on these considerations, District leadership, in collaboration with other stakeholder groups, determined that the use of handheld metal detection wands, combined with restrictions on the types of items permitted into school facilities, would provide an effective and more sustainable approach to maintaining safety and security during after-school events.

Corrective Action Planned

As an alternative action, District leadership, in collaboration with other stakeholder groups, determined that the use of handheld metal detection wands, combined with restrictions on the types of items permitted into school facilities, would provide an effective and more sustainable approach to maintaining safety and security during after-school events.

Target Completion Date: July 1, 2026

Accountable Chief / Division: Todd Kessinger, Chief of Police; Safety and Security

Operational Lead / Owner: Todd Kessinger, Chief of Police; Robert Ritter, Manager Risk Assessment Coordinator Support

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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

All schools are provided with a disproportionality profile at the end of each semester. This informs the school of their current risk ratio as well as rate per 100 for referrals, removals, and out-of-school suspensions. For the 2026-27 school year, this action will be completed January 10, 2027, and June 10, 2027. Evidence will be the disproportionality profiles. In addition, a District-level team is being created to review behavior data biannually. The team will be a collaboration between all District departments that relate to supporting behavior as well as representatives from ECE, O&A, and the Office of Multilingual Learners (OML). Disaggregated data will be analyzed, and District School Assistant Superintendents will be given recommendations for support from the committee. The first meeting will be in October 2026 and will continue every other month through the school year. The spreadsheet that contains notes from the meeting and the recommendations made by the committee serve as evidence.

Corrective Action Planned

Disproportionality profiles are given to every school at the end of each semester. This year, that will be done January 10, 2027, and June 10, 2027. School profiles are the evidence. The District Collaborative Behavior Committee will have its first meeting by October 15, 2026 and continue to meet through the year. The agendas and recommendations will serve as evidence.

Target Completion Date: October 15, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Matt Anderson, Executive Director Success and Resilience

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.

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, Success and Resilience Department, and the Academics 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Police Department (PD) will continue participating in monthly cross-functional meetings with District leadership, including representatives from JCPS PD, ARSI, the Success and Resilience Department, and the Academics Division, to review trends related to student citations and identify opportunities for improvement. These meetings include analysis of available data by discipline event, race, and disposition to better understand underlying factors and determine whether additional interventions or policy adjustments are warranted. JCPS PD also supports school-level collaboration to identify trends, address concerns, and develop strategies tailored to the needs of individual schools.

In addition to these monthly reviews, JCPS PD convenes both internal and external Data Review Committees on a quarterly basis. These committees review enforcement data, examine trends, assess equity in law enforcement practices, and provide valuable feedback and recommendations to promote transparency, accountability, and continual improvement.

JCPS PD maintains a strong commitment to the consistent application of criminal charges throughout the District. We strive to ensure that conduct resulting in law enforcement action at one school is addressed in the same manner at every other school, promoting equitable enforcement regardless of school location.

It is also important to note that JCPS PD does not proactively initiate criminal charges against students. Officers respond only when they receive a call for service or are requested to investigate an incident. Charging decisions are based on the facts and evidence of each individual case and are made in accordance with applicable laws, departmental policy, and established procedures.

Corrective Action Planned

Additionally, JCPS PD is developing a pre-arrest diversion program that will provide officers with appropriate alternatives to traditional law enforcement responses when circumstances permit. This initiative will allow officers to connect eligible students with intervention and support services designed to address underlying causes of behavior, reduce unnecessary justice system involvement, and improve long-term student outcomes.

Target Completion Date: January 4, 2027

Accountable Chief / Division: Todd Kessinger, Chief of Police

Operational Lead / Owner: Todd Kessinger, Chief of Police

Chapter 09: Curriculum and Instruction

Finding 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, or the broader community.

Recommendation 9.1.a

The Board, in coordination with JCPS administration and its strategic planning process, should determine the role of the Goals and Guardrails as they relate to student outcomes.

Implementation Status: Not Implemented

Corrective Action Planned

The Board and Superintendent will establish unified District goals to measure student outcomes and the District's overall success as part of the development of a new strategic plan.

Senate Bill 1 (2026) requires the Board to, "by December 1 each year, approve a rolling five (5) year strategic plan for the District that outlines student outcome goals, faculty and staff improvement goals, facility and infrastructure improvement, and other key objectives that the superintendent and board believe are in the best interest of student outcomes and the community."

The Chief of Strategy and Innovation will lead the development of the strategic plan. The person to be hired for a newly created position, the Strategic Planning Specialist, will support the Chief. Having a highly qualified person dedicated to the development of the strategic plan aligns with the Senate Bill 1 requirement of a rolling five-year strategic plan. It will ensure that the District has a coherent set of action steps to achieve the District's goals and actively monitors outcomes against the goals and indicators of progress.

In June 2026, the District issued a Request for Proposals for a Strategic Plan Development Consultant and received 12 responses. The American Association of School Administrators submitted the successful proposal, and the Board approved a contract at the July 21, 2026, Board meeting.

As part of the development of a new strategic plan, the Board and Superintendent will establish student readiness goals for elementary, middle, and high school students to measure student academic outcomes and the District's overall success.

For each academic goal, a collaboration between the Academics Division and the ARSI Division will establish annual milestones. Each annual milestone will be reported in the aggregate and for every state-reported student group. Those milestones will include Goal Progress Measures (GPMs)—leading indicators that will provide progress monitoring regarding whether or not the District is on track to achieve the longer-term goals established by the Board in the Strategic Plan. This will allow for course-correction through changes to implementation strategies and interventions.

The milestones will also include Operational Performance Metrics (OPMs), which will measure intervention strategy responsiveness and effectiveness. These metrics will allow the District to track schools' progress toward ensuring effective implementation of interventions as well as the effectiveness of the interventions themselves.

Additional OPMs will be identified through the strategic planning process to monitor progress monthly, quarterly, and annually, disaggregated by student group, campus, and the District overall.

OPMs and GPMs are the earlier visibility and leading indicators; the annual student outcome goals are the lagging indicators. Together, they will drive meaningful improvement in literacy, numeracy, and college- and career-readiness outcomes. They will measure the effectiveness of the District's response to student needs rather than activities or compliance.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Jefferson County Board of Education; Superintendent Dr. Brian Yearwood; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Nathan Balasubramanian, Chief Academic Officer; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Finding 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, or the broader community.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The Board and the Superintendent will ensure that the District’s strategic plan establishes clear academic goals and associated GPMs and OPMs (as illustrated in Recommendation 9.1a). These goals will be communicated transparently and consistently to the public, the Board, school-based staff, parents, and the community.

Specifically, JCPS commits to the following:

- Adoption timeline—The Board will establish and adopt goals and the accompanying GPMs and OPMs on or before December 1, 2026, through the strategic planning process.
- Reporting cadence—Progress against GPMs will be reported to the Board following each administration of formative assessments established by the District; OPMs will be reported quarterly; annual student outcome goals will be reported to the Board and the public after each official Kentucky Summative Assessment (KSA) release.
- Disaggregation—All measures will be reported in aggregate and disaggregated by every state-reported student group, by campus, and by grade band.
- Accessible communication—Results will be published on the JCPS website, summarized in plain-language Board reports, and disseminated to school-based staff through the campus website and Principal communications. In this way, Board, families, Teachers, school administrators, District leaders, and the community share a common view of progress.
- Consistency—The same definitions, baselines, and calculation methods will be used across Board reports, public communications, and staff-facing materials to ensure clarity of communication.

The milestones will also include OPMs that will measure intervention strategy responsiveness and effectiveness. These metrics will allow the District to track schools’ progress toward ensuring effective implementation of interventions as well as the effectiveness of the interventions themselves.

The strategic planning process will identify additional OPMs to monitor progress monthly, quarterly, and annually, disaggregated by student group, campus, and the District overall.

OPMs and GPMs are the earlier visibility and leading indicators; the annual student outcome goals are the lagging indicators. Together, they will drive meaningful improvement in literacy, numeracy, and college- and career-readiness outcomes. They will measure the effectiveness of the District’s response to student needs rather than activities or compliance.

Target Completion Date: December 1, 2026

Accountable Chief / Division: Jefferson County Board of Education; Superintendent Dr. Brian Yearwood; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Nathan Balasubramanian, Chief Academic Officer; Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Beginning in June 2026, Regional Assistant Superintendents collaborated to streamline communication and coordination across all school levels and the District divisions responsible for providing services and supports to schools.

Corrective Action Planned

As part of this effort, all K–12 Principals will operate from a single planning document—the Comprehensive School Improvement Plan (CSIP)—to promote alignment and coherence and reduce duplication of effort. Additionally, beginning in the 2026-27 school year, the District will implement a common walkthrough tool across all schools to collect consistent instructional data, identify Districtwide trends, and inform targeted supports and continuous improvement efforts. Principals will be invited to discussions regarding shifts that will impact schools and leadership practices.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Jessica Rosenthal, Regional Assistant Superintendent of Middle Schools

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

In June 2026, the Regional Assistant Superintendents collaborated to develop a Principal Workflow Hub designed to serve as a cross-divisional tracking system that streamlines and coordinates communication from the District office to school leaders. Additionally, a standardized school visit log was created for Assistant Superintendents

and Principal Supervisors to document school visit outcomes, identify emerging needs, and facilitate requests for targeted District supports for individual schools.

Corrective Action Planned

Principal Supervisors/Regional Assistant Superintendents will communicate school-level needs. Academic Directors, Principal Supervisors, and Assistant Superintendents will coordinate and document visits. This approach will result in a noticeably streamlined and expedited process for school leaders. The school visit log will be collaboratively updated quarterly (September 30, 2026; December 31, 2026; and March 31, 2027).

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Jessica Rosenthal, Regional Assistant Superintendent of Middle Schools

Finding 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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Effective July 1, 2026, the Board approved significant revisions to the District Organizational Chart with changes to the structure of Divisions and Departments to better align with the strategic goals of the District. This reorganization combined the previously separate Academics, Schools, and ECE Divisions into a single Academics Division led by the Chief Academic Officer reporting directly to the Superintendent. The revamped Academics Division has seven Assistant Superintendents responsible for the curriculum, instruction, assessment, and school-supervision functions who report to one cabinet position, the Chief Academic Officer. The Executive Officer ECE also reports to the Chief Academic Officer. This consolidation eliminates duplicative decision paths, aligns curriculum design and deployment with school supervision, and gives Principals and school-based staff a single accountable executive for instructional coherence. The Chief Academic Officer will lead the District in implementing a coherent, systematic, aligned plan to improve student outcome goals described in Recommendations 9.1a and 9.1b.

Additionally, as part of the reorganization, the O&A Division (formerly the Diversity, Equity, and Poverty Division) has tightened its focus to address nonacademic issues impacting student success, including school culture and sense of belonging, supporting improved student behavior, and support for children and youth who are homeless and foster care children and youth.

Corrective Action Planned

After the reorganization in 2026, the Cabinet is currently the same size as in 2025, with 13 members who report directly to the Superintendent. In the coming year, the Superintendent will assess whether the number of direct reports should be reduced and how.

Target Completion Date: July 1, 2027

Accountable Chief / Division: Dr. Brian Yearwood, Superintendent

Operational Lead / Owner: Lynn Reynolds, Special Assistant to the Superintendent

Finding 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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Beginning in June 2026, all Academics Division leaders and Principals began participating in ongoing professional learning on the KDE Curriculum Implementation Framework and Intellectual Preparation to strengthen the implementation of High-Quality Instructional Resources (HQIRs). These guidance documents are critical to ensuring that Teachers effectively use the HQIRs and assessment data to establish targeted, small-group differentiated learning opportunities designed to meet students' needs. Additionally, the District's revised organizational structure, which includes Regional Academic Coaches, Instructional Leads, and an Academic Director assigned to each region, as well as K–12 Academic Specialists and a Multi-Tiered System of Supports (MTSS) Team, will strengthen support for Teachers and leaders through coaching focused on HQIR implementation, small-group differentiated instruction, and effective evidence-based, high-leverage instructional practices.

Corrective Action Planned

Beginning in August 2026, Academics Division staff, in collaboration with school administrators, will conduct ongoing classroom walkthroughs and provide regular feedback to Teachers to ensure consistent implementation and continuous improvement of instructional practices.

Target Completion Date: December 31, 2026

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Shalonda Foster, Assistant Superintendent of Curriculum and Professional Learning

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.

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 MLs and students with disabilities.

Implementation Status: Partially Implemented

Corrective Action Already Taken

High expectations are paramount to providing students with rigorous academic experiences in every JCPS classroom. Ongoing professional learning on HQIR implementation fidelity, unit and lesson internalization, high-leverage instructional strategies, standards deconstruction, and MTSS began in July 2026 to provide Teachers with a stronger foundation to set high expectations for students. ECE staff provide targeted support in classrooms

serving students with disabilities, including supports and coaching focused on access to grade-level instruction, especially designed instruction, differentiation, and inclusive practices.

Corrective Action Planned

A Districtwide instructional framework is being designed to ensure that all students have equitable access to daily grade-level instruction, along with appropriate scaffolding to meet individual needs. In addition, Regional Assistant Superintendents, Principal Supervisors, and Academic Directors will identify specific areas of opportunity for coaching and support. Instructional Leads and Regional Academic Coaches will initiate intentional coaching cycles with Teachers. These cycles will be closely monitored for positive impact on student outcomes. The new Academics Division structure allows for coaching cycles with individual Teachers, Professional Learning Communities (PLCs), grade levels, or whole-school instructional staff. These coaching cycles will address setting and maintaining high expectations for all students, particularly in classrooms serving diverse learners, including MLs and students with disabilities. Beginning in August 2026, ECE staff will increase intentional focus to support Teachers by partnering with Academics and the Office of Multilingual Learners (OML) to compare data, develop trainings, and offer building-level coaching. The ECE Department created Specially Designed Instructional Coach positions to assist in this effort.

Target Completion Date: April 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Shalonda Foster, Assistant Superintendent Curriculum and Professional Learning

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS has taken significant steps to strengthen professional learning and coaching systems that support high-quality instruction. On July 1, 2026, the District established an Academics Division of Regional Academic Coaches, Instructional Leads, and an Academic Director assigned to each region, as well as K–12 Academic Specialists and an MTSS Team, that began to provide school-based and Districtwide professional learning focused on effective implementation of HQIRs on July 28, 2026.

Corrective Action Planned

Professional learning during the 2026-27 school year will emphasize instructional practices that increase student engagement, deepen conceptual understanding, and promote critical thinking through rigorous, standards-aligned learning experiences. Beginning July 28, 2026, Teachers received support in effectively implementing the HQIRs, unit and lesson internalization, and instructional strategies that foster meaningful discourse, problem-solving, and the application of learning. In addition, beginning in August 2026, School Administrators, Principal Supervisors, Assistant Superintendents, and Instructional Support Staff will utilize a common walkthrough tool and provide ongoing feedback to strengthen instructional practice and ensure consistency across classrooms. These efforts are

designed to build Teacher confidence, increase clarity around HQIR expectations, and improve outcomes for all students. In addition, the new Academics structure allows for coaching cycles with individual Teachers, PLCs, grade levels, or whole-school instructional staff. These coaching cycles will address student engagement, promoting deeper conceptual understanding, and fostering critical thinking.

Target Completion Date: April 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Shalonda Foster, Assistant Superintendent, Curriculum and Professional Learning

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS has begun planning to 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.

Corrective Action Planned

JCPS will 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. (This action is currently in the planning stage and will be completed by June 30, 2027.)

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Tracy Barber, Regional Assistant Superintendent of Elementary School

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.

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).

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Superintendent has adopted and implemented a Districtwide JCPS Focused Instructional Walkthrough Tool to be used consistently by all school administrators in grades K–12. The walkthrough tool was revised to include a specific indicator for student-to-student purposeful academic discourse, requiring observers to document evidence of peer-to-peer academic talk during classroom observations. In addition, the District developed a professional learning plan to support implementation of the walkthrough tool and strengthen educators' use of high-yield instructional practices that promote student agency, structured academic discourse, and collaborative learning. The revised JCPS Focused Instructional Walkthrough Tool was completed and adopted on June 30, 2026. Administrators will complete the Districtwide professional learning and calibration sessions by June 30, 2027. Evidence includes the JCPS Focused Instructional Walkthrough Tool, training materials and agendas for administrator calibration sessions, professional learning materials focused on High-Yield Instructional Practices and completed walkthrough documentation collected through the District's observation process.

Corrective Action Planned

JCPS will implement a comprehensive professional learning and coaching plan to ensure consistent use of the JCPS Focused Instructional Walkthrough Tool and strengthen Tier 1 instructional practices that promote student agency and student-to-student purposeful academic discourse. All Principals, Assistant Principals, Principal Supervisors, and Instructional Leaders will participate in calibration training on the walkthrough tool to ensure consistent implementation and feedback. In addition, Teachers will receive professional learning focused on High-Yield Instructional Practices, classroom routines, and discussion protocols that foster student collaboration, academic discourse, and independent learning. Districtwide administrator calibration training and professional learning for instructional staff will be completed by June 30, 2027. Ongoing coaching and monitoring will continue throughout the 2026-27 school year. Evidence of completion will include administrator training agendas and attendance records, professional learning materials, completed calibration activities, coaching logs, completed JCPS Focused Instructional Walkthrough forms, school-level walkthrough data demonstrating implementation, and District monitoring reports documenting increased evidence of student-to-student purposeful academic discourse.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Tracy Barber, Regional Assistant Superintendent of Elementary School

Chapter 10: Assessments, Accountability, and Systems Improvement

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.

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.

Implementation Status: Not Implemented

Corrective Action Planned

The JCPS Strategy and Innovation Division will develop a new District strategic plan that will establish Districtwide priorities, goals, and performance measures for improving student outcomes. The strategic planning process will identify priority areas for instructional improvement and provide the framework for aligning District resources, staffing, and supports with the District's highest academic needs. As the strategic plan is developed, the Academics Division will also establish a Districtwide MTSS structure to coordinate academic, behavioral, and student support efforts across departments and schools. The strategic plan and MTSS framework will provide the foundation for prioritizing supports, strengthening core instruction, and targeting interventions based on identified District needs. The District's Division of Strategy and Innovation leadership will oversee development of the strategic plan in partnership with the selected strategic planning vendor, the American Association of School Administrators. The Board approved a contract at the July 21, 2026, Board meeting. In collaboration with the strategic planning vendor and the Chief of Strategy and Innovation, ARSI will support the development of performance measures and monitoring processes aligned with the strategic plan. The Academics Division, in collaboration with the District MTSS Team and other operational departments, will be responsible for implementing the instructional priorities, supports, and professional learning identified through the strategic planning process.

The District will engage in the strategic planning process to be completed by December 1, 2026. Senate Bill 1 (2026) requires the Board to approve a rolling five-year strategic plan by December 1 of each year.

The District has completed an RFP process that includes reviewing and rating various vendor proposals. The evaluation criteria used to select the American Association of School Administrators included: 1. Relevant experience, 2. Organizational design and systems expertise, 3. Capacity for timely delivery, 4. Methodology and approach, 5. Stakeholder engagement strategy, 6. Examples of previous work, 7. Implementation support, and 8. Cost. The JCPS Chief of Strategy and Innovation has a proven record with strategic planning work at both the school and District levels.

Target Completion Date: March 24, 2027

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation/designee; Nathan Balasubramanian, Chief Academic Officer/Designee

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.

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.

Implementation Status: Partially Implemented

Corrective Action Planned

In January 2026, JCPS established measurable District and subgroup performance goals through the Comprehensive District Improvement Plan (CDIP) using Kentucky accountability measures, including KSA proficiency data and achievement gap performance. These multiple goals are monitored (including student achievement goals) through the annual District performance review process, including the December 2025 KSA results presentation to the Board of Education. As the District develops its next strategic plan, these existing District and subgroup performance goals will be incorporated into the strategic plan to ensure alignment between District improvement planning, strategic priorities, and performance monitoring. Future updates to District and subgroup targets will continue to be informed by the annual release of Kentucky accountability results and other District performance data. District leadership from Strategy and Innovation will oversee development of the strategic plan in partnership with the selected strategic planning vendor. The District will develop and monitor District performance measures, including District and subgroup goals aligned with Kentucky accountability measures. The Academics Division and other District departments will use these goals to guide improvement planning and monitor progress throughout the implementation of the strategic plan. JCPS will continue to monitor District and subgroup performance through its established District goal-monitoring process. District performance measures will be reviewed using annual KSA results following their release each October, along with other District performance indicators. District and subgroup goals will be reviewed annually through the CDIP process and incorporated into the District's strategic plan. ARSI will support recurring reporting of progress toward the District's five student achievement goals, providing District leadership with regular performance updates to inform decision-making and any necessary revisions to District strategies or targets.

Milestones include the following: 1. October 2026—Review 2025-26 KSA results and District subgroup performance. 2. January 2027—Update District and subgroup performance goals through the CDIP, as appropriate. 3. Winter/Spring 2027—Incorporate District and subgroup performance goals into the new District strategic plan as part of the strategic planning process. 4. October 2027—Review 2026-27 KSA results and evaluate progress toward District and subgroup performance goals. 5. Annually thereafter (each October)—Review KSA results and revise District and subgroup goals, as appropriate, through the CDIP and strategic planning processes.

1. JCPS 2026-27 CDIP containing District and subgroup performance goals aligned with Kentucky accountability measures. 2. 2026-27 District Goals Document identifying measurable student achievement goals, including subgroup performance targets. 3. District Strategic Plan incorporating District and subgroup performance goals. 4. KSA Data Review Materials documenting annual analysis of District and subgroup performance following the October release of state assessment results. 5. Annual CDIP Review and Revision Documentation demonstrating that District and subgroup goals are reviewed and updated using the most recent KSA results.

Target Completion Date: January 1, 2027

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation/Designee; Nathan Balasubramanian, Chief Academic Officer/Designee

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Planned

JCPS will implement and evaluate its District School Improvement Planning Framework, which establishes a standardized, differentiated system of support for schools based on performance data, accountability status, and demonstrated need. The framework creates a consistent process for identifying schools requiring additional support, matching those schools with appropriate District resources, and monitoring the effectiveness of those supports through recurring progress reviews. Rather than applying a single intervention to all schools, the framework provides differentiated levels of support that increase in frequency and intensity based on each school’s needs and progress over time. This systematic approach will allow the District to assess whether the supports provided to Red and Orange schools are accelerating improvement and to make adjustments when schools are not demonstrating sufficient progress.

The Academics Division will lead implementation of the differentiated support model in collaboration with the ARSI Department, Principal Supervisors, School Improvement Partners, and other District departments, as appropriate. The Academics Division will coordinate differentiated supports for schools, while ARSI will monitor implementation fidelity, analyze student outcome data, and evaluate the effectiveness of the differentiated support model in accelerating improvement for the District’s lowest-performing schools.

JCPS will administer recurring CSIP Implementation and conduct Impact Cycle reviews three times annually (October, January, and June) to evaluate school progress and determine whether differentiated supports should be maintained, intensified, modified, or reduced. These reviews will include analysis of i-Ready reading and mathematics achievement and growth data, CSIP implementation evidence, focused instructional walkthroughs, attendance, behavior, and other Vital Signs indicators. District leadership will use these recurring review cycles to assess the effectiveness of the differentiated support model for Red and Orange schools and make data-informed decisions regarding the allocation and adjustment of District resources and supports throughout the school year. A comprehensive evaluation of the differentiated support model will be completed following the 2026-27 school year to identify refinements for future implementation.

The JCPS District School Improvement Planning Framework was completed and implemented on July 8, 2026, in preparation for the 2026-27 school year.

The District School Improvement Planning Framework was presented and discussed with all JCPS Principals at the annual Leadership Institute on July 8–9, 2026.

Target Completion Date: July 8, 2026

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 10.4.a

JCPS should establish districtwide, multiyear goals aligned to the Kentucky Accountability System in its new strategic plan to ensure progress on state-measured outcomes.

Implementation Status: Partially Implemented

Corrective Action Already Taken

In January of 2026, JCPS established measurable District and subgroup performance goals through the CDIP using Kentucky accountability measures, including KSA proficiency data and achievement gap performance. These goals are monitored through the District's five student achievement goals and annual District performance review process.

CSIP submission to KDE on January 1, 2026

Corrective Action Planned

As the District develops its new strategic plan, these Districtwide, multiyear goals will be incorporated into the strategic plan to provide a unified framework for long-term improvement, ensuring alignment between the District's strategic priorities, Kentucky accountability measures, and District improvement planning. District goals will continue to be reviewed annually and refined as new accountability data become available.

District leadership in the Division of Strategy and Innovation will oversee development of the strategic plan in partnership with the selected strategic planning vendor. The District will support the development, monitoring, and reporting of Districtwide performance measures aligned with the Kentucky Accountability System. ARSI will work with the Academics Division and other District departments to ensure that District goals remain aligned with state accountability measures and are incorporated into the District's strategic planning and continuous improvement processes.

JCPS will continue to monitor Districtwide progress through its established District goal monitoring process. Progress toward District goals will be reviewed using annual Kentucky Accountability System results, including KSA data following its release each October, as well as other District performance indicators. District leadership will review progress toward the District's five student achievement goals through recurring performance monitoring and the annual CDIP review process. As part of the strategic plan, these multiyear goals will be reviewed annually and updated, as appropriate, based on performance trends and changes to state accountability measures.

1. October 2026—Review 2025-26 KSA results and District subgroup performance. 2. January 2027—Update District and subgroup performance goals through the Comprehensive District Improvement Plan (CDIP), as appropriate. 3. Winter/Spring 2027—Incorporate District and subgroup performance goals into the new District strategic plan as part of the strategic planning process. 4. October 2027—Review 2026-27 KSA results and evaluate progress toward District and subgroup performance goals. 5. Annually thereafter (each October)—Review KSA results and revise District and subgroup goals, as appropriate, through the CDIP and strategic planning processes.

Evidence of this work will include: 1. JCPS Comprehensive District Improvement Plan (CDIP) containing Districtwide goals aligned with the Kentucky Accountability System. 2. District Strategic Plan incorporating Districtwide, multiyear goals aligned with Kentucky accountability measures. 3. District Goal Monitoring Reports reporting progress toward the District's five student achievement goals. 4. Kentucky Accountability System Annual Data Review Materials, including KSA results reviewed following the October state data release. 5. Annual CDIP Review and Revision Documentation demonstrating the ongoing review and refinement of District goals using state accountability data.

Target Completion Date: March 24, 2027

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement; Katy DeFerrari, Chief of Strategy and Innovation/designee; Nathan Balasubramanian, Chief Academic Officer/designee

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).

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 support for TSI schools to prevent those schools from escalating to CSI or ATSI identification.

Implementation Status: Partially Implemented

Corrective Action Planned

JCPS has developed and adopted a revised District School Improvement Planning Framework that establishes a differentiated, tiered system of support for schools based on performance, accountability status, and leadership need. The framework standardizes improvement expectations across all schools while increasing the frequency and intensity of District support as school need increases. Schools identified as Targeted Support and Improvement (TSI), Additional Targeted Support and Improvement (ATSI), Comprehensive Support and Improvement (CSI), and More Rigorous Intervention (MRI) receive progressively more intensive coaching, monitoring, instructional support, and progress reviews. The framework also incorporates structured progress monitoring through CSIP implementation and impact cycles, allowing the District to systematically evaluate whether differentiated supports are improving student outcomes and reducing the need for increased state identification.

JCPS will implement and evaluate its new District School Improvement Planning Framework, which establishes a standardized, four-tier differentiated support system for schools based on accountability status, school performance, and leadership need. The framework defines the level of District coaching, monitoring, and support provided to TSI, ATSI, CSI, and MRI schools and establishes a consistent process for monitoring the effectiveness of those supports through the CSIP implementation and impact cycles. Schools identified as CSI and MRI will receive the District's highest level of support, including external executive leadership coaching through The Bailey Group and SchoolKit, in addition to District-led instructional and leadership supports. The Academics Division, in collaboration with the ARSI Division, Principal Supervisors, School Improvement Partners, and external leadership partners (The Bailey Group and SchoolKit), will execute this work. The Academics Division will coordinate differentiated coaching and school supports while ARSI will collect, analyze, and report student outcome data to evaluate the effectiveness of the differentiated support model. JCPS will ensure that the framework is implemented consistently through scheduled CSIP Implementation and Impact Cycle reviews conducted three times annually, aligned with District assessment windows and school improvement milestones. Schools will participate in recurring progress-monitoring meetings that include review of i-Ready reading and mathematics achievement and growth data, focused instructional walkthrough evidence, CSIP implementation evidence, and other accountability indicators. District leadership, in partnership with The Bailey Group and SchoolKit for CSI and MRI schools, will use these recurring reviews to determine whether schools are making sufficient progress, whether differentiated supports should be intensified or reduced, and whether the support model is effectively preventing TSI schools from escalating to ATSI or CSI identification. The District will complete a comprehensive evaluation of the differentiated support model following the conclusion of the 2026-27 school year and use the results to refine the framework for future implementation.

The JCPS District School Improvement Planning Framework was completed and implemented on July 8, 2026, in preparation for the 2026-27 school year. Interim milestones include: 1. August 2026—Completion of contracting with external leadership coaching groups 2. October 2026—Completion of the first CSIP Implementation and

Impact Cycle review, including analysis of initial i-Ready achievement and growth data and evaluation of differentiated supports provided to TSI, ATSI, CSI, and MRI schools. 3. January 2027—Completion of the second CSIP Implementation and Impact Cycle review, including mid-year evaluation of school progress and adjustment of differentiated supports based on implementation evidence and student outcome data. 4. June 2027—Completion of the third CSIP Implementation and Impact Cycle review and end-of-year evaluation of implementation fidelity across all differentiated support tiers. 5. August 2027—Completion of the District evaluation of the effectiveness of differentiated supports using 2026-27 i-Ready achievement and growth data, implementation monitoring results, and school accountability outcomes. Recommendations for refinement of the differentiated support model for the 2027-28 school year will be finalized at that time.

The JCPS District School Improvement Planning Framework was presented and discussed on July 8–9, 2026, with all JCPS Principals at the annual Leadership Institute.

Target Completion Date: July 8, 2026

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement

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.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS completed a comprehensive redesign of its Districtwide school improvement system through the development and implementation of the JCPS District Improvement Framework. The new framework streamlines the District's previous school improvement processes into a single, coherent model that clearly defines how District priorities, school planning, progress monitoring, and differentiated supports function together to improve student outcomes.

The framework aligns school improvement efforts around a common continuous improvement process by 1. Establishing three Districtwide improvement priorities based on findings from the KDE Diagnostic Review, Cognia Accreditation Review, and the State Audit. 2. Connecting District goals, CSIPs, Vital Signs reporting, and student outcomes into one integrated data and improvement cycle. 3. Standardizing the school improvement planning process by aligning CSIP goals, strategies, activities, and progress monitoring expectations. 4. Creating a clearly defined annual improvement cycle with established planning, implementation, monitoring, and review phases. 5. Implementing a four-tier system of differentiated support that scales District assistance based on school performance and leadership need while maintaining consistent improvement expectations across all schools.

The redesigned framework was developed collaboratively with District leadership, including the Academics Division, and was refined through feedback from school Principals to ensure the model is practical, clearly understood, and responsive to the needs of schools.

The redesigned JCPS District Improvement Framework was completed on July 8–9, 2026, and is being implemented for the 2026-27 school year.

Evidence includes discussions with Principals at the annual JCPS Leadership Institute. Furthermore, evidence of implementation includes the following: 1. The completed JCPS District Improvement Framework document, which outlines the District's unified school improvement model and its components. 2. Documentation showing

the alignment of District improvement priorities with recommendations from the KDE Diagnostic Review, Cognia Accreditation Review, and the State Audit. 3. The newly established school improvement planning process, including standardized CSIP requirements, annual planning phases, integrated progress monitoring expectations, and the four-tier differentiated support model for schools.

Target Completion Date: July 8, 2026

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 10.7.a

JCPS should evaluate the effectiveness of its Enhanced Support Zone (ESZ) support model for 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.

Implementation Status: Not Implemented

Corrective Action Planned

The ARSI Department will conduct a formal evaluation of the ESZ support model to determine whether the current model provides sufficient differentiated supports to improve outcomes for MRI schools. The evaluation will assess the implementation and effectiveness of ESZ supports, examine whether District resources are appropriately targeted to school needs, identify areas of duplication or gaps in services, and determine whether refinements to the model or resource allocation are warranted. As part of the implementation of the ESZ model, performance outcome metrics have been incorporated into contracts with external leadership coaching providers to establish clear expectations for support and accountability. In addition, JCPS is collaborating with KDE Education Recovery Specialists to coordinate District and state supports for MRI schools. Each participating school will develop and implement 30-, 60-, and 90-day action plans that establish measurable milestones, document implementation progress, and support continuous monitoring throughout the school year. Findings from the evaluation will be used to recommend improvements to the ESZ support model for future implementation.

The ARSI Department will lead the evaluation in collaboration with the Academics Division, Enhanced Support Zone leadership, Principal Supervisors, KDE Education Recovery Specialists, and external leadership coaching partners. ARSI will design the evaluation, collect and analyze implementation and student outcome data, and prepare recommendations regarding the effectiveness of the ESZ model and opportunities to improve coordination, resource allocation, and differentiated supports.

ARSI will conduct the evaluation using a structured evaluation plan that includes recurring implementation reviews, analysis of student outcome data, stakeholder feedback, and a review of the services and supports provided to MRI schools. Implementation will be monitored throughout the 2026-27 school year through 30-, 60-, and 90-day school action plans, recurring progress reviews with District leadership, and ongoing collaboration with KDE Education Recovery Specialists. Performance expectations established within contracts for external leadership coaching providers will also be monitored as part of the evaluation to assess the effectiveness of contracted supports. In summary: Following receipt of the 2026-27 Kentucky accountability results, ARSI will complete a comprehensive evaluation of the ESZ support model. The Academics Division and District leadership will use the evaluation findings to refine the ESZ model, eliminate duplicative supports, strengthen coordination among support providers, and better align District resources with school needs.

Since it will be critical to incorporate into the evaluation the accountability results for the 2026-27 school year and KDE typically delivers these results in October, the date for completing the evaluation will be December 2027.

A timeline has been established for ensuring the successful evaluation of the ESZ during the 2026-27 school year:

1. July 2026—ESZ support model discussed with Principals and preparing for an effective implementation for the 2026-27 school year.
2. September 2026—ARSI develops and finalizes the ESZ Evaluation Plan, including evaluation questions, measures/performance indicators, data sources, data analysis, and implementation timeline.
3. January 2027—Mid-year implementation review completed, including documentation of ESZ supports, implementation fidelity, and stakeholder feedback. Development of a matrix of supports within the ESZ.
4. June 2027—End-of-year data collection completed, including implementation evidence, District support documentation, and preliminary student outcome measures using interim assessment data as well as other metrics.
5. October 2027—Kentucky state accountability results for the 2026-27 school year received and incorporated into the evaluation.
6. December 2027—ARSI completes the evaluation of the ESZ Support Model, including findings regarding implementation effectiveness, adequacy of differentiated supports, resource allocation, and recommendations for refinement beginning with the 2027-28 school year.

Target Completion Date: December 3, 2027

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement

Operational Lead / Owner: Danielle Doelling, Director of Accountability, Research, and Systems Improvement

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Planned

JCPS has redesigned its District School Improvement Planning Framework to establish a single, unified continuous improvement process for all schools, including those identified for federal support and improvement. Rather than requiring separate planning and monitoring structures for federally designated schools, the framework aligns District improvement priorities, CSIPs, progress monitoring, and differentiated supports within one integrated system.

This approach reduces duplication by ensuring that schools maintain one school improvement plan, one progress-monitoring cycle, and one set of District improvement priorities, while receiving differentiated supports based on demonstrated need rather than additional stand-alone requirements. JCPS is working closely with KDE to align all processes for those schools with federal classifications.

The District will also evaluate implementation of the framework to ensure that support activities provided to federally designated schools are coordinated, complementary, and designed to maximize time spent on school improvement rather than compliance.

Planned Action: JCPS will implement and evaluate its new District School Improvement Planning Framework, which establishes a standardized, four-tier differentiated support system for schools based on accountability status, school performance, and leadership need. The framework defines the level of District coaching, monitoring, and support provided to TSI, ATSI, CSI, and MRI schools and establishes a consistent process for monitoring the effectiveness of those supports through the CSIP implementation and impact cycles. Schools

identified as CSI and MRI will receive the District's highest level of support, including external executive leadership coaching through The Bailey Group and SchoolKit, in addition to District-led instructional and leadership supports.

The Academics Division will lead implementation of the unified school improvement framework in collaboration with the ARSI Department, Principal Supervisors, School Improvement Partners, and other District departments providing school supports. District leadership will coordinate planning, monitoring, and support activities to ensure that school improvement requirements are aligned and unnecessary duplication is minimized.

January 1, 2027, is when the CDIP and CSIPs will be submitted to KDE.

Interim milestones include: 1. July 2026—JCPS District School Improvement Planning Framework implemented, establishing a unified school improvement process for all schools. 2. October 2026—First CSIP Implementation and Impact Cycle review completed, including review of implementation requirements and alignment of District supports. 3. January 2027—Mid-year review completed, including feedback from school leaders and District staff regarding the efficiency and coordination of school improvement requirements. 4. June 2027—End-of-year review completed, including assessment of implementation fidelity and identification of opportunities to further streamline District support. 5. August 2027—Annual review of the unified school improvement framework completed, including recommendations to eliminate redundant requirements and improve coordination of differentiated supports for the 2027-28 school year.

Evidence demonstrating implementation and completion of this recommendation will include: 1. JCPS District School Improvement Planning Framework (implemented July 2026) establishing a unified continuous improvement process for all schools. 2. 2026-27 CSIP Guidance reflecting one integrated planning process for all schools. 3. 2026-27 CSIP Implementation and Impact Cycle Protocols documenting the standardized October, January, and June progress-monitoring process. 4. CSIP Implementation and Impact Cycle Review Reports documenting implementation fidelity and coordination of District supports. 5. School leader and Principal Supervisor feedback summaries regarding the effectiveness and efficiency of the unified school improvement process. 6. District review of school improvement requirements and support activities, documenting efforts to identify and eliminate duplicative planning, monitoring, and reporting expectations across District departments. 7. 2026-27 Annual Review of the District School Improvement Framework (August 2027) documenting findings and recommendations for continuous refinement of the unified school improvement process.

Target Completion Date: August 15, 2027

Accountable Chief / Division: Marco Muñoz, Executive Officer Accountability, Research, and Systems Improvement; Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Danielle Doelling, Director Accountability, Research, and Systems Improvement; Nathan Balasubramanian, Chief Academic Officer/Designee

Chapter 11: Diversity, Equity, and Poverty

Finding 11.1

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.

Recommendation 11.1.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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The District has established multiple initiatives designed to recruit, prepare, support, and retain high-quality educators, including Grow Your Own educator pathways, the Louisville Teacher Residency, strategic partnerships with educator preparation providers, targeted recruitment events, and comprehensive induction and mentoring supports. The District recognizes that a high-quality educator workforce is one of the strongest predictors of student success and that recruiting talented educators from a broad range of backgrounds expands the pool of qualified candidates available to serve JCPS students. This intentional work began in August 2020. Evidence that the work occurred includes the Louisville Teacher Residency Program, Educators Rising/Secondary Education Pathways, Teach Kentucky, Option 7 and Option 9 pathways, AIS Stipends, New Teacher Induction, and Employee Resource Groups.

Corrective Action Planned

- Recruitment and retention assessment completed—100%
- Annual workforce report completed—100%
- University and educator preparation partnerships expanded—Annual increase planned
- Qualified Teacher applications—Annual increase planned
- Teacher vacancy rate—Annual reduction
- First-year Teacher retention—Annual improvement
- Overall Teacher retention—Annual improvement
- Applicant-to-hire conversion rate—Annual improvement
- Recruitment event effectiveness evaluated—100%
- Workforce Dashboard updated—Quarterly

Target Completion Date: June 30, 2027

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Kevin Brown, General Counsel; Jonathan Lowe, Executive Director Policy and Systems; Sylena Fishback, Director Louisville Teacher Residency Program

Finding 11.2

JCPS has persistent gaps in student achievement across multiple student subgroups.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Opportunity and Access Tool (OAT) was developed and integrated into some of the Internalization documents supported by the Academics Division. This will support Teachers in their planning of responsive units that address all student subgroups within JCPS. The plan is for all internalization documents to have the OAT embedded within.

This was completed in April 2026.

Opportunity and Access (O&A) and Academics representatives held a series of meetings to discuss appropriate connections between curriculum support resources from both departments; the OAT and the Unit Internalization guidance were reviewed and edited to reflect these connections.

Corrective Action Planned

The OAT has been developed and integrated into some of the Internalization documents supported by the Academics Division. This will support Teachers in their planning of responsive units that address all student subgroups within JCPS. The plan is for all internalization documents to have the OAT embedded within.

This was completed in April 2026.

O&A and Academics representatives held a series of meetings to discuss appropriate connections between curriculum support resources from both departments; the OAT and the Unit Internalization guidance were reviewed and edited to reflect these connections.

Target Completion Date: August 3, 2026

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: Rachel Klein, Specialist, Opportunity and Access Support

Finding 11.3

The demographic composition of the JCPS teacher workforce does not reflect the racial or ethnic diversity of the JCPS student population.

Recommendation 11.3.a

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.

Implementation Status: Partially Implemented

Corrective Action Planned

JCPS will evaluate the effectiveness of its Teacher recruitment and retention strategies by analyzing applicant, interview, hiring, placement, and retention data disaggregated by race and ethnicity. The District will complete this assessment on or before December 31, 2026. Evidence will include the Teacher Workforce Diversity Recruitment and Retention Effectiveness Assessment and the supporting demographic data tables comparing the Teacher workforce, applicant pool, new hires, separations, and student population.

JCPS will revise its Teacher recruitment strategy to establish measurable goals and targeted outreach activities for increasing the representation of underrepresented groups within the applicant pool and Teacher workforce. The District will complete this action on or before December 31, 2026. Evidence will include a Teacher Workforce

Diversity Recruitment and Retention Plan, which will identify recruitment goals, responsible departments, implementation timelines, performance measures, and required investments.

JCPS will expand targeted recruitment partnerships with historically Black colleges and universities, minority educator associations, alternative-certification programs, educator-preparation programs, and community organizations. The District will complete this action on or before December 31, 2026. Evidence will include executed partnership agreements, recruitment-event calendars, event participation records, candidate referral data, and applicant-source reports from the applicant tracking system.

JCPS will strengthen retention supports for educators from underrepresented groups through targeted mentoring, affinity-based professional support, leadership-development opportunities, and stay interviews. This District will complete this action on or before December 31, 2026. Evidence will include an Underrepresented Educator Retention Support Framework, mentor and participant rosters, stay-interview protocols, professional-learning materials, attendance records, and retention data for participating employees.

JCPS will implement a recurring monitoring process to evaluate progress toward diversifying the educator workforce and determine whether recruitment and retention investments are producing measurable results. The District will complete this action on or before December 31, 2026. Evidence will include an Educator Workforce Diversity Dashboard, quarterly review reports, meeting agendas and minutes, documented strategy adjustments, and annual workforce demographic reports prepared in accordance with applicable Board policy and KRS 161.165.

Target Completion Date: December 31, 2026

Accountable Chief / Division: Melvin Brown, Executive Officer Talent

Operational Lead / Owner: Sylena Fishback, Director Louisville Teacher Residency Program; Jasmine Drinkard, Assistant Director Retention and Engagement

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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

The Equity Monitoring Progress Tool (EMPT); Racial Equity Plans; Leading with Equity, Accountability, Support, Expectations (LEASE); and Affirming Racial Equity (ARE) Tools have been discontinued. The REAP has been discontinued and replaced with the Assessing Decisions Impacting Access (ADIA) Protocol, which accounts for all student demographics. The ARE Tool has been condensed and named the OAT. Schools have responsibility for completing an O&A CSIP Goal as a part of the broader comprehensive school improvement process. This was completed by July 2026. This information communicated to Principals and Assistant Principals during the beginning-of-the-year meetings.

Target Completion Date: July 1, 2026

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access

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.

Recommendation 11.4.b

JCPS should conduct targeted, school-level follow-up to better understand how Opportunity and Access (formerly Diversity, Equity, and Poverty or 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

A targeted, school-level approach has been designed to ensure clarity regarding how Opportunity and Access (O&A) tools and resources should be implemented. This approach, called Opportunity and Access Calibration and Check-In (OACC) was completed, prepared, and presented as an official system in July 2026. Evidence that this occurred is captured in an email from John Marshall, Chief of Opportunity and Access, to Angela Hosch, Interim Chief Academic Officer, on June 16, 2026. There is an official schedule for these school visits available upon request.

Corrective Action Planned

In previous years, schools were visited on a rotating schedule. OACC visits will occur in every school as of July 2026; visits from O&A Teams begin in October and conclude in April. Regional Assistant Superintendents and Principal Supervisors have the visit schedule and will be following up on OACC visits during their routinely planned school visits and their Implementation and Impact (I&I) checks throughout the school year. Agendas containing prepared materials from these meetings are also shared with Regional Assistant Superintendents and Principal Supervisors.

Target Completion Date: April 29, 2027

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access; Rachel Klein, Specialist Opportunity and Access

Finding 11.5

The 2025-2028 JCPS Racial Equity Plan lacks clearly defined, actionable activities, progress measures, and goals.

Recommendation 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.

Implementation Status: Alternative Action

Alternative Action

There will be a shift moving from the Racial Equity Plan to an Opportunity and Access (O&A) Framework. The O&A Framework consists of three components: Academics, Culture and Climate, and Learning Support. Within those components are Access Areas, Metrics, and Reporting Frequency. There will be a dashboard in which the data can be filtered by school, zone, and student demographic.

Target Completion Date: August 31, 2026

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access; Greg Vann, Assistant Director Opportunity and Access

Finding 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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The JCPS Racial Equity Policy will change to reflect the recent changes to anchor documents and changes to goal setting, monitoring, and reporting protocols via CSIP and will reflect all subgroups that consistently demonstrate achievement gaps relative to the overall student population. This is an interdepartmental process that members of O&A will lead. Monitoring of implementation and impact will occur during CSIP implementation and impact checks, during O&A Calibration / Check-in visits as well as through the O&A Framework/Dashboard.

Target Completion Date: July 1, 2027

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access

Finding 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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

With the Districtwide shift to moving all accountability systems and documentation to the CSIP, the Racial Equity Plan goals that schools previously submitted to Opportunity and Access(O&A) (formerly Diversity, Equity, and Poverty or DEP) are now being submitted and monitored via the CSIP. For consistency and monitoring, the new

O&A goal is universal, while schools can select Objectives and Activities that are unique to their school's populations and needs. This goal was designed with input from Schools Division personnel. This became official on July 6, 2026, and forward-facing to Principals at the July 8 Principal's Meeting (see slides 18–24).

Corrective Action Planned

In previous years, schools submitted annual Racial Equity Plans that were designed in response to their annual EMPT feedback pointing toward specific areas of growth. The EMPT has been terminated; now O&A Teams will conduct OACC visits every school as of July 2026 to support how schools monitor progress toward their O&A CSIP Goal and Objectives. Visits from O&A Teams begin in October and conclude in April. Regional Assistant Superintendents and Principal Supervisors have the visit schedule and will be following up on OACC visits during their routinely planned school visits and their I&I checks throughout the school year. Agendas containing prepared materials from these meetings are also shared with regional assistant superintendents and Principal Supervisors.

Target Completion Date: August 21, 2026

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access

Finding 11.8

Principals reported that the school racial equity plans felt burdensome and disconnected from other goal setting, progress monitoring, and reporting requirements.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

A targeted, school-level approach to connecting other goal setting, progress monitoring, and reporting requirements has occurred Districtwide, eliminating individual departments' accountability documents and processes and instead embedding all relevant goals into a school's CSIP. To support a school's O&A goal, O&A has devised an annual school visit approach—the OACC. The OACC was completed, prepared, and presented as an official system in July 2026. Evidence that this occurred is captured in an email from John Marshall, Chief of Opportunity and Access to Angela Hosch, Interim Chief Academic Officer, on June 16, 2026. There is an official schedule for these school visits available upon request.

Corrective Action Planned

In previous years, schools submitted annual Racial Equity Plans that were designed in response to their annual EMPT feedback pointing toward specific areas of growth. The EMPT has been terminated; now O&A Teams will conduct OACC visits every school as of July 2026 to support how schools monitor progress toward their O&A CSIP Goal and Objectives. Visits from O&A Teams begin in October and conclude in April. Regional Assistant Superintendents and Principal Supervisors have the visit schedule and will be following up on OACC visits during their routinely planned school visits and their I&I checks throughout the school year. Agendas containing prepared materials from these meetings are also shared with regional Assistant Superintendents and Principal Supervisors.

Target Completion Date: April 29, 2027

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access; Rachel Klein, Specialist Opportunity and Access

Finding 11.8

Principals reported that the school racial equity plans felt burdensome and disconnected from other goal setting, progress monitoring, and reporting requirements.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

A targeted, school-level approach to connecting other goal setting, progress monitoring, and reporting requirements has occurred Districtwide, eliminating individual departments' accountability documents and processes and instead embedding all relevant goals and documentation into a school's CSIP. To support a school's O&A goal, O&A has devised an annual school visit approach—the OACC. The OACC was completed, prepared, and presented as an official system in July 2026. Progress monitoring will occur in conjunction with I&I meetings that are set between school leaders and their Principal Supervisors. Evidence that this occurred is captured in an email from John Marshall to Angela Hosch on June 16, 2026. There is an official schedule for these school visits available upon request.

Corrective Action Planned

In previous years, schools submitted an EMPT within their broader Racial Equity Profile. The EMPT has been terminated; now O&A Teams will conduct OACC visits every school as of July 2026 to support how schools monitor progress toward their O&A CSIP Goal and Objectives. Visits from O&A Teams begin in October and conclude in April. Regional Assistant Superintendents and Principal Supervisors have the visit schedule and will be following up on OACC visits during their routinely planned school visits and their I&I checks throughout the school year. Agendas containing prepared materials from these meetings are also shared with regional Assistant Superintendents and Principal Supervisors.

Target Completion Date: April 29, 2027

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access; Rachel Klein, Specialist Opportunity and Access

Finding 11.9

There is no direct connection between the District Racial Equity Plan and individual schools' Racial Equity Plans.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

School Racial Equity Plans have shifted to the CSIP. All schools now are responsible for an O&A CSIP Goal with Objectives, Strategies, Actions, and Progress Monitoring. ARSI is currently developing the Access Areas and Metrics within the O&A Framework and Dashboard to reflect similar areas in the O&A CSIP Objectives that schools are responsible for completing. This was completed by July 2026. Evidence of this work includes There are the O&A CSIP Guide and the Draft Opportunity and Access Framework.

Corrective Action Planned

There will be a shift moving from the Racial Equity Plan to an Opportunity and Access O&A Framework. The O&A Framework consists of three components: Academics, Culture and Climate, and Learning Support. Within those components are Access Areas, Metrics, and Reporting Frequency. There will be a dashboard in which the data can be filtered by school, zone, and student demographic. School O&A CSIP Goals align with the components identified in the O&A Framework. ARSI and the O&A Department are currently working on the O&A Framework and Dashboard. Monitoring will occur during Principal Supervisor site visits, CSIP I&I Checks, and O&A Calibration / Check-in visits.

Target Completion Date: August 28, 2026

Accountable Chief / Division: John Marshall, Chief of Opportunity and Access

Operational Lead / Owner: William Bunton, Director Opportunity and Access

Chapter 12: Exceptional Child Education

Finding 12.1

JCPS identifies students with Specific Learning Disabilities at a rate below the national and statewide averages and identifies students with Other Health Impairments at higher rates than the national or statewide averages.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

During the 2025-26 school year: 1. Multiple professional learning sessions conducted regarding Specific Learning Disability (SLD) guidance, Other Health Impairment (OHI) eligibility, dyslexia, and Emotional Behavioral Disability (EBD), 2. Monthly Implementation Coach / Admissions and Release Committee (ARC) Chair meetings review record findings to identify trends and professional learning needs, and 3. ECE Department record reviews are conducted two times annually. All activities were completed by May 2026. Evidence of activities includes training materials, guidance documents, record review protocols, and agendas.

Corrective Action Planned

Throughout the 2026-27 school year, the ECE Department will: 1. Continue expanding the record review process, 2. Continue training appropriate stakeholders on eligibility determination guidelines, and 3. Continue review of data to identify trends and professional learning needs. The anticipated completion date for all activities is May 2027. Evidence of activities includes record review data, eligibility determination data, and training materials.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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 and statewide averages.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS has implemented a systematic process to use evaluation record review findings to inform professional learning for school psychologists and multidisciplinary evaluation teams. Departmental record reviews have been conducted approximately two to three times annually to evaluate the consistency of evaluation and eligibility practices. Findings from these reviews are analyzed and discussed during monthly meetings to identify trends, determine areas requiring additional support, and guide future professional learning. Based on these analyses, the District has provided training on SLD eligibility, OHI eligibility, dyslexia assessment, and EBD guidance to improve consistency in eligibility determinations and ensure alignment with District procedure as well as state

and federal requirements. Evidence of implementation includes departmental record review summaries, monthly meeting agendas, training materials, and attendance records.

Corrective Action Planned

Beginning in August 2026, the ECE Department will conduct analyses of record review results to identify recurring implementation trends, monitor fidelity to District evaluation procedures, and determine where additional coaching or technical assistance is needed. Professional learning topics will be adjusted based on these findings to ensure that school teams consistently apply eligibility criteria in accordance with District guidance and applicable state and federal laws. Evidence of implementation will include record review reports, professional learning, and updated training materials.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

Beginning in July 2024, District staff provided training on the Test of Dyslexia (TOD) and dyslexia identification practices, with refresher training provided in July 2026. In August 2024, school psychologists participated in professional learning on KDE's updated SLD guidance. During the 2024-25 school year, additional training was provided on OHI eligibility requirements. Departmental record reviews conducted approximately two to three times each year are analyzed to identify areas where additional professional learning or targeted coaching is needed. These actions ensure that training is responsive to identified implementation needs rather than delivered as a one-time event. Evidence of implementation includes agendas, presentation materials, and record review data.

Corrective Action Planned

Beginning in August 2026, schools demonstrating implementation concerns through record reviews or data analysis will receive differentiated coaching and technical assistance, while Districtwide training will continue to address common areas of need identified across schools. The District will monitor implementation through record reviews and annual analyses to evaluate the effectiveness of professional learning and determine additional training priorities. Evidence of implementation will include record review summaries, support logs, and updated evaluation guidance materials.

Target Completion Date: June 27, 2026

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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.

Recommendation 12.2.a

JCPS should review current and historical evaluation reports to 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS ECE Department has implemented multiple actions to strengthen consistency in eligibility determinations and monitor disproportionality across student groups. During the 2024-25 and 2025-26 school years, disproportionality was incorporated as a Professional Growth Plan goal for all school psychologists to increase awareness and improve evaluation practices. In September 2025, school psychologists received professional learning on the Culturally and Linguistically Inclusive Multitiered (CLIM) framework to strengthen culturally responsive evaluation practices. In February 2026, additional professional learning was provided through a webinar that a practicing School Psychologist led. This professional learning focused on the culturally responsive identification of students with SLDs. Throughout the school year, District leadership regularly reviewed disability identification data to monitor trends across disability categories and student subgroups. School Psychologists utilizing Supported Case Management (SCM) procedures were also required to consult with the Lead Psychologist to promote consistency in eligibility determinations. District leadership additionally identified the need to expand bilingual evaluation capacity to strengthen culturally and linguistically responsive evaluation practices. Evidence of implementation includes training materials, agendas, and District identification data reports.

Corrective Action Planned

Beginning in August 2026, JCPS will formalize quarterly reviews of evaluation and eligibility data to identify potential inconsistencies across disability categories and student demographic groups. The ECE Department will utilize findings from these reviews to inform targeted professional learning, coaching, and technical assistance for evaluation teams. District leadership will continue monitoring identification trends for SLDs, OHIs, Developmental Delay, EBD, Autism, and Moderate Mental Disability to ensure that eligibility determinations are applied consistently and in accordance with state and federal requirements. JCPS will also continue efforts to explore partnerships with universities that prepare multilingual School Psychologists and Evaluators. Evidence of implementation will include disproportionality reports and meeting agendas documenting data review and action planning.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS has begun strengthening evaluation practices for Multilingual Learners (MLs) by providing professional learning focused on improving present levels of academic and functional performance and increasing educator understanding of language development during the evaluation process. District staff have also incorporated discussion of ML considerations into professional learning opportunities for school-based teams. These efforts support more meaningful consideration of language acquisition when reviewing evaluation data and determining eligibility. Evidence of implementation includes professional learning presentations, meeting agendas, and documentation of training provided to school-based staff.

Corrective Action Planned

Beginning in August 2026, JCPS ECE will implement a structured review of current and historical evaluation reports involving MLs to determine whether language development is consistently documented and appropriately considered during eligibility determinations. Findings from these reviews will be used to refine District guidance, identify additional professional learning needs, and provide targeted coaching for evaluation teams. District leadership will monitor implementation through periodic record reviews and follow-up technical assistance.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS ECE has incorporated co-teaching into professional learning to strengthen evidence-based instructional support and intervention practices prior to referral for special education evaluation.

Corrective Action Planned

Beginning in August 2026, the District will strengthen referral guidance for documenting interventions for MLs.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS identified increasing multilingual evaluation capacity as a District staffing priority and incorporated the recruitment of bilingual evaluation personnel into workforce planning discussions.

Corrective Action Planned

The District will continue partnering with the Talent Division to recruit bilingual and multilingual evaluation personnel and evaluate the recruitment progress annually as part of workforce planning.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.4

JCPS does not provide written guidance on IEP development for multilingual learners.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS developed and disseminated written guidance to support school-based teams in making appropriate referral, evaluation, and eligibility decisions for MLs suspected of having disabilities. The guidance was introduced through professional learning provided to Implementation Coaches, School Psychologists, Counselors, Diagnosticians, and other evaluation staff to promote consistent implementation across the District. Evidence of implementation includes the District's written ML guidance, professional learning presentations, and training records.

Corrective Action Planned

Beginning in August 2026, JCPS will review and refine the ML guidance based on staff feedback and implementation monitoring. Updated guidance will continue to be incorporated into annual professional learning for evaluation teams and school-based staff to ensure consistent implementation across the District.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS implemented the Critical Question Tool to support the District review of student placement decisions and strengthen data-informed discussions regarding LRE. The tool was introduced through Principal PLCs and Implementation Coach PLCs to promote consistent consideration of placement decisions and instructional supports across schools.

Corrective Action Planned

Beginning in August 2026, the District will incorporate LRE data and IEP review findings into professional learning to strengthen placement decisions and access to general education.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS ECE developed and implemented professional learning focused on the use of modified curriculum resources to increase student access to grade-level instruction within general education classrooms. Training was provided to Teachers and Implementation Coaches during the 2025-26 school year.

Corrective Action Planned

Beginning in August 2026, ECE region support teams will continue providing classroom-based coaching aligned with District instructional priorities and will monitor implementation through ongoing coaching cycles.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 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 with Tier 1 classrooms, as well as access to Tier 2 and Tier 3 intervention opportunities when needed.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS expanded coaching support by providing professional learning on evidence-based instructional strategies, differentiated instruction, and LRE practices.

Corrective Action Planned

Beginning August 2026, JCPS ECE will continue providing coaching, supports, and monitoring aligned with best practices.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS continued Districtwide professional learning on collaborative instructional practices through Implementation Coach support and Teacher training designed to increase effective instruction within inclusive classrooms.

Corrective Action Planned

The District will continue expanding professional learning focused on collaborative teaching and evidence-based instructional practices as part of its annual professional learning plan.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS implemented District training on LRE decision making and established ongoing monitoring of student programming and placement decisions throughout the school year to support data-informed educational planning.

Corrective Action Planned

Beginning in August 2026, District leadership will continue reviewing LRE data with school teams and provide targeted guidance and technical assistance based on District placement trends.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.6

Most students with disabilities in JCPS do not demonstrate grade-level reading proficiency.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS implemented a Districtwide Reading Intervention Plan (RIP) to strengthen the consistent use of evidence-based literacy instruction and instructional materials across schools. The RIP established a framework for supporting students with disabilities through explicit and systematic reading instruction aligned with District expectations. Evidence of implementation includes the RIP, District guidance documents, and implementation meeting agendas.

Corrective Action Planned

Beginning in August 2026, the District will continue monitoring implementation of the RIP through school support visits and instructional coaching to ensure that reading materials are implemented consistently across grade levels.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.6

Most students with disabilities in JCPS do not demonstrate grade-level reading proficiency.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS expanded the implementation of i-Ready as the District's universal reading screening and progress-monitoring system. Professional learning was provided to educators to support consistent administration and use of student reading data to guide instructional decision making and intervention planning. Evidence of implementation includes i-Ready professional learning materials, District assessment guidance, and implementation documentation.

Corrective Action Planned

Beginning in August 2026, JCPS will continue using universal screening and progress-monitoring data to refine intervention decision rules and strengthen Tier 2 and Tier 3 reading supports for students with disabilities.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.6

Most students with disabilities in JCPS do not demonstrate grade-level reading proficiency.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS established ongoing professional learning through ECE Implementation Coach PLCs to strengthen standards-aligned instruction and improve instructional planning for students with disabilities. The PLC process provides a structured method for supporting educators through coaching and collaborative review of instructional practices aligned with District literacy expectations. Evidence of implementation includes PLC agendas, coaching documentation, and Implementation Coach meeting materials.

Corrective Action Planned

Beginning in August 2026, the District will expand the use of IEP reviews to examine alignment between literacy goals and progress-monitoring practices. Results will be used to provide targeted coaching and professional learning for special educators.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.7

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.

Recommendation 12.7.a

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, the ECE Department began a partnership with the Academics Division that provides a coordinated process for reviewing instructional practices and increasing access to grade-level mathematics instruction through collaboration between general and special education. Evidence of implementation includes guidance documents.

Corrective Action Planned

Beginning in August 2026, the ECE Department and the Academics Division will review mathematics instructional practices to provide targeted professional learning to strengthen the implementation of accessible, standards-based mathematics instruction across grade levels.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.7

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.

Recommendation 12.7.b

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, the ECE Department began collaborating with the Academics Division to strengthen District mathematics systems and improve instructional decision making for students with disabilities. This collaboration established a foundation for aligning mathematics instruction, intervention planning, and progress-monitoring practices across departments.

Corrective Action Planned

Beginning in August 2026, the District will expand this collaboration to review mathematics screening practices, intervention decision making, and progress-monitoring procedures to promote greater consistency across schools.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.7

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS initiated strategic collaboration between the ECE Department and the Academics Division to align professional learning and instructional supports for students with disabilities. This collaboration established a framework for future coaching and professional learning focused on improving mathematics instruction and outcomes for students with IEPs.

Corrective Action Planned

Beginning in August 2026, the ECE Department and the Academics Division will develop training and coaching focused on standards-aligned mathematics instruction, specially designed instruction, and mathematics goal development for students with disabilities.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.8

Students with disabilities in JCPS are more likely to experience the use of physical restraint or seclusion than non-disabled students.

Recommendation 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.

Implementation Status: Partially Implemented**Corrective Action Already Taken**

During the 2025-26 school year, JCPS strengthened District implementation of Positive Behavioral Interventions and Supports (PBIS) by providing coordinated behavioral support to schools through the ECE Department and the Comprehensive Coordinated Early Intervention Services (CCEIS) Team. Professional learning and technical assistance emphasized proactive behavioral supports consistent with Individuals with Disabilities Education Act (IDEA) requirements and District expectations for students with disabilities. Evidence of implementation includes PBIS implementation records, District training materials, and support documentation.

Corrective Action Planned

Beginning in August 2026, JCPS will continue reviewing District behavior guidance and provide training to reinforce requirements related to positive behavioral interventions, restraint, and seclusion.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.8

Students with disabilities in JCPS are more likely to experience the use of physical restraint or seclusion than non-disabled students.

Recommendation 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.

Implementation Status: Partially Implemented**Corrective Action Already Taken**

During the 2025-26 school year, JCPS expanded PBIS implementation through coordinated support provided by the CCEIS Team and District behavior specialists. Schools received coaching and technical assistance to strengthen Tier 1 behavioral systems and support implementation of evidence-based practices for students with disabilities. Evidence includes PBIS implementation records, coaching documentation, and support logs.

Corrective Action Planned

Beginning in August 2026, the District will continue expanding PBIS implementation and strengthen the monitoring of BIP implementation through ongoing coaching and technical assistance provided to schools.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.8

Students with disabilities in JCPS are more likely to experience the use of physical restraint or seclusion than non-disabled students.

Recommendation 12.8.c

The District's ECE Department, in partnership with the Department of Success and Resilience, will 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS established ongoing collaboration between the ECE Department, CCEIS, and District behavior support personnel to provide professional learning and technical assistance on evidenced-based behavioral practices for students with disabilities.

Corrective Action Planned

Beginning August 2026, the ECE Department will continue partnering with District behavioral support teams to provide professional learning and coaching on disability-related behaviors, evidence-based interventions, and proactive behavioral supports.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.9

Students with disabilities in JCPS are more likely to be involved in school disciplinary events than their non-disabled peers.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS used District discipline and behavior data to identify disproportionality concerns and provide targeted behavioral support to schools. District staff engaged in data discussions, reviewed patterns in student behavior and disciplinary referrals, and provided Board Certified Behavior Analyst (BCBA), PBIS, and individualized student support where additional intervention was needed. The District's implementation documentation identifies 2024 discipline data, meeting records, and school support logs as available evidence.

Corrective Action Planned

Beginning in August 2026, JCPS will establish a formal quarterly discipline data-review process. Reviews will include discipline incidents, disability status, and schools. Schools demonstrating concerning patterns will receive follow-up support to determine whether FBAs have been completed and whether BIPs need to be developed, implemented with greater fidelity, or updated.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.9

Students with disabilities in JCPS are more likely to be involved in school disciplinary events than their non-disabled peers.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

During the 2025-26 school year, JCPS provided individualized behavioral consultation and student support through BCBAs, CCEIS staff, and other District behavior-support personnel to help school teams identify proactive interventions and strengthen behavioral planning for students experiencing repeated behavioral or disciplinary concerns.

Corrective Action Planned

Beginning in August 2026, JCPS will incorporate family participation into its proactive behavioral-planning process for students with IEPs who demonstrate repeated or significant behavioral concerns. School teams will document family input regarding student strengths, behavioral triggers, successful strategies, and needed supports when developing or revising FBAs, BIPs, and other individualized behavioral intervention

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

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.

Recommendation 12.10.a

The District should continue to monitor disproportionate identification practices across gifted and talented programs.

Implementation Status: Fully Implemented

Corrective Action Already Taken

Regarding monitoring disproportionate identification, three times a year the Gifted/Talented Supervisor J calculates and monitors the disparity of identification for our population groups. Thompson also trains schools on using data chats to establish building norms for standardized testing to increase identification. Current one-pagers include College Equipped Readiness Tools (CERT) Data Analysis, Measures of Academic Progress (MAP)/i-Ready Data Analysis, and Naglieri Nonverbal Ability Test 3 (NNAT3) Data Analysis to support Counselors with identification.

Corrective Action Planned: Ongoing annually

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

A specific presentation on Identifying and Providing Services to Gifted MLs was conducted by the Gifted/Talented Supervisor. This presentation was created in conjunction with and vetted in collaboration with the ML Department.

Corrective Action Planned: Ongoing annually

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Gifted Department utilizes the JCPS Translation Library to translate various documents into the top five languages. The Gifted Department also utilizes a Google Site that allows families to translate each page into their native language.

Corrective Action Planned

The Supervisor Gifted and Talented Programs will have the *Procedures Handbook* (linked on the JCPS website) translated into the top five languages.

Target Completion Date: December 31, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

Finding 12.11

JCPS's early learning programs have consistently failed to prepare preschool students with disabilities for kindergarten.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Already Taken

JCPS has identified kindergarten readiness for preschool students with disabilities as an area requiring targeted improvement.

Corrective Action Planned

During the 2026-27 school year, JCPS will conduct a Districtwide review of kindergarten-readiness data for preschool students with disabilities. The review will examine schools and programs demonstrating stronger social-emotional readiness outcomes to identify strategies that may be replicated across early learning programs.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Finding 12.11

JCPS's early learning programs have consistently failed to prepare preschool students with disabilities for kindergarten.

Recommendation 12.11.b

JCPS should examine best practices utilized in comparable districts related to early childhood special education and implementation plan to build staff capacity and strengthen Kindergarten readiness.

Implementation Status: Not Implemented

Corrective Action Already Taken

JCPS has identified the need to strengthen early childhood special education programming and kindergarten readiness.

Corrective Action Planned

During the 2026-27 school year, JCPS will conduct a structured review of early childhood special education practices in comparable school districts. Findings will be used to identify District priorities and develop an implementation plan for improvement toward kindergarten readiness.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Nina Beck, Executive Officer Exceptional Child Education

Operational Lead / Owner: Nina Beck, Executive Officer Exceptional Child Education

Chapter 13: Multilingual Resources and Support

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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The Office of Multilingual Learners (OML) has established an asset-based vision for MLs and, over the past three years, has developed role-specific guidance and resources to clarify the responsibilities of Teachers, school leaders, and central office staff in supporting MLs. OML has also prioritized high-quality instructional coaching for English Language Development (ELD) Teachers to strengthen implementation of the ELD framework and ensure that MLs continue to develop English language proficiency while accessing rigorous instruction. In addition, OML has supported schools in developing data-informed master schedules that provide MLs with equitable access to both language development services and grade-level academic content.

Because MLs are simultaneously developing English proficiency and academic content knowledge, their success depends on the collective responsibility of all educators, not solely ELD Teachers. While OML has previously provided professional learning and instructional resources to support this work, the District recognized the need for a more sustainable, systemwide approach that builds the capacity of content leaders, instructional coaches, school leaders, and classroom Teachers to consistently implement effective instructional practices for MLs.

Corrective Action Planned

Beginning in the 2026-27 school year, JCPS will leverage its new organizational structure to strengthen this work through a more coherent Districtwide strategy. As Principal Supervisors partner with school leaders in the development and monitoring of CSIPs, schools will be expected to establish goals and action steps that address the achievement and growth of MLs as part of their overall school improvement efforts. This work will be supported through aligned professional learning, instructional coaching, and ongoing collaboration across academic departments to ensure that ML achievement is embedded within the District's broader academic strategy rather than functioning as a stand-alone initiative.

Target Completion Date: June 1, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer; Office of Multilingual Learners

Operational Lead / Owner: Jill Handley, Assistant Superintendent of Instructional Programming

Finding 13.2

District staff identified building the capacity of all educators to effectively serve Multilingual Learners (MLs) as an area of growth.

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.

Implementation Status: Not Implemented**Corrective Action Already Taken**

During the 2025-26 school year, OML developed a coaching protocol for ELD Teachers to build their capacity for teaching ELD as evidenced by coaching logs and OML impact reports.

Corrective Action Planned

JCPS agrees that building the capacity of all educators to effectively serve MLs is essential to improving student outcomes. Beginning in the 2026-27 school year, the District's new organizational structure provides an opportunity to implement a more sustainable, Districtwide approach to professional learning and instructional coaching. This work will extend beyond OML to include content leaders, Instructional Coaches, school leaders, and Principal Supervisors, ensuring that ML supports are embedded across all instructional systems. The District will also establish processes to monitor the effectiveness of professional learning and coaching and use that information to continuously refine supports and strengthen instructional practices for MLs.

Target Completion Date: June 1, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer; Office of Multilingual Learners; Academics, Curriculum Department

Operational Lead / Owner: Jill Handley, Assistant Superintendent of Instructional Programming

Finding 13.3

JCPS has an achievement gap between ML and non-ML students.

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.

Implementation Status: Partially Implemented**Corrective Action Already Taken**

OML works closely with the ARSI Division to extract data and provide a data snapshot and recommendations for each school as they relate to their MLs.

Corrective Action Planned

See Management Response to Finding 13.1. JCPS is committed to reducing achievement gaps for MLs through improved instructional practices, targeted professional learning, and strategic resource allocation informed by multiple measures of student performance.

The District also recognizes that assessment data for MLs must be interpreted within the context of English language acquisition. MLs are developing English language proficiency while simultaneously mastering grade-level academic content, and student performance is influenced by both language development and academic learning. Accordingly, JCPS will continue working with KDE to advocate for equitable assessment practices while supporting educators in understanding how to appropriately scaffold instruction and assessments based on students' English language proficiency levels. Building educator capacity to effectively differentiate instruction and provide appropriate language supports remains a central component of the District's strategy for improving outcomes for MLs.

Additionally, OML will work closely with Principal Supervisors to help support specific CSIP goals each school has as they relate to MLs.

Target Completion Date: June 1, 2027

Accountable Chief / Division: Nathan Balasubramanian, Chief Academic Officer

Operational Lead / Owner: Jill Handley, Assistant Superintendent of Instructional Programming

Chapter 14: College and Career Readiness

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.

Recommendation 14.1.a

JCPS should review all roles District-wide 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.

Implementation Status: Not Implemented

Corrective Action Planned

With the current reorganization, we have an opportunity for Districtwide, cross-departmental collaboration to establish a robust system for partnership cataloging to improve efficiency, communication, and coordination amongst staff and outside agencies. An opportunity also exists with the new role of Executive Director of Outreach and Community Partnerships to develop a Districtwide, centralized tracking system for partners. Specialist School Business Partnerships will coordinate a meeting with the new Executive Officer of Communications and the new Director of Outreach and Partnership Development to create a committee and system for the District. This new system will then be provided to division Chiefs to distribute to departments for use. Ensuring use will be ongoing, with the committee naming a point person and location for it to be housed and updated.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 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.

Implementation Status: Not Implemented

Corrective Action Planned

The District will look to move forward with the creation of a Districtwide partnership tracking system that can be shared.

In partnership with the Academies of Louisville Alliance, a detailed partnership tracking system is currently maintained for partnerships with Academies of Louisville schools. This system tracks the type of organization, which schools they partner with, and contact information for company representatives as well as the number and types of experiences they offered to students.

When a Districtwide partnership system is created by the committee, the Academies of Louisville Alliance tracking system will be aligned in real time with updates by Specialist, School Business Partnerships and Alliance community liaison partners. This will be maintained by the Alliance and the point person determined by the committee.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

School teams track experiential learning opportunities for Academy of Louisville schools through a dedicated tab in Infinite Campus, and equitable access is analyzed quarterly. For Academies of Louisville schools, gaps in equitable access to partners are analyzed twice a year and targeted recruitment is deployed to ensure that each school has at least two partnerships for every industry in which the school offers a pathway.

Middle schools that offer the Explore Program also track experiential learning for student engagement and equitable experiences. The data is analyzed quarterly.

Corrective Action Planned

A next step is for non-Academy of Louisville high schools and all middle schools to track experiential learning in Infinite Campus and address gaps across schools/student groups. The Director Post Secondary Planning and Middle School Explore Coaches will conduct the training to support all high schools and middle schools in tracking experiences. Data will be analyzed quarterly to ensure tracking is occurring.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

Finding 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.

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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The new website for JCPS was launched July 1, 2026, and has a section for “students and families” with a link to “Graduation, College, and Career Center”.

Corrective Action Planned

The District will refresh and update this section on a regular and ongoing basis. In August 2026, the Director Post Secondary Planning will update the website for the Graduation, College, and Career Center. The site will be reviewed annually to ensure that updates are made.

Target Completion Date: December 31, 2026

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 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.

Implementation Status: Partially Implemented

Corrective Action Already Taken

JCPS acknowledges that Postsecondary Readiness gaps continue to exist for several student groups, including African-American and Hispanic/Latino students, MLs, students with disabilities (ECE), and economically disadvantaged students. While these disparities remain an area of focus, the District has implemented intentional systems and supports that have resulted in significant improvement over the past five years.

Beginning in the 2020-21 school year, JCPS implemented a more intentional, data-driven approach to Postsecondary Readiness that included weekly monitoring of student outcomes, monthly leadership reviews, strengthened school-level accountability, cross-departmental collaboration, and targeted professional learning for Career and Technical Education (CTE) staff. This coordinated approach has enabled identifying student needs earlier, implementing targeted interventions, and continuously monitoring progress toward Postsecondary Readiness goals.

The CTE Team monitors Postsecondary Readiness data weekly and provides monthly updates to the School Programming Leadership Team to identify trends, monitor subgroup performance, and guide targeted interventions.

Since the 2020-21 school year, which serves as the baseline for this analysis, JCPS has experienced substantial gains in Postsecondary and Career Readiness outcomes.

Postsecondary and Career Readiness Outcomes

All Students

- Current Postsecondary Readiness: 88.1%
- Current Career Readiness: 60.8%
- Growth Since 2020-21: PSR +91% | Career +114%

Students With Disabilities (ECE)

- Current Postsecondary Readiness: 53.1%
- Current Career Readiness: 37.3%
- Growth Since 2020-21: PSR +278% | Career +311%

MLs

- Current Postsecondary Readiness: 65.5%
- Current Career Readiness: 41.5%
- Growth Since 2020-21: PSR +333% | Career +215%

Black/African-American Students

- Current Postsecondary Readiness: 80.7%
- Current Career Readiness: 57.0%
- Growth Since 2020-21: PSR +166% | Career +185%

Non-White Students

- Current Postsecondary Readiness: 83.8%
- Current Career Readiness: 58.6%
- Growth Since 2020-21: PSR +130% | Career +163%

These gains are the result of intentional, Districtwide efforts to improve equitable access to Postsecondary Readiness opportunities. The CTE Team collaborates closely with the ECE and ML Departments to align supports, remove barriers to participation, and ensure that students receive targeted interventions. This work is complemented by ongoing collaboration with school leaders, continuous monitoring of student progress, and professional learning designed to strengthen instruction and improve outcomes.

Additionally, the District has intentionally embedded literacy and applied mathematics into CTE curricula, reinforcing academic standards while strengthening the technical knowledge and employability skills students need for success after high school. The ECE Team uses student readiness data to identify students requiring additional support and connect them with appropriate postsecondary-readiness pathways and interventions.

Corrective Action Planned

Although achievement gaps remain, the data demonstrate that the intentional focus on equity, collaboration, accountability, and continuous improvement has resulted in meaningful progress across every major student subgroup. JCPS remains committed to building on this momentum by continuing to use data to drive decision making, strengthening partnerships across departments, and implementing targeted supports that ensure every student has equitable access to Postsecondary Readiness opportunities.

The District recognizes that increasing overall performance is not sufficient if subgroup disparities remain. Consequently, closing these gaps—not simply improving overall outcomes—will continue to be a primary focus of the District’s Postsecondary Readiness efforts through goal setting, biannual action planning with leaders, and monthly meetings with the High School Regional Team. The Director Career and Technical Education will continue to hold regular meetings with the High School Regional Team to monitor quarterly and create support plans for schools with the CTE Instructional Leads. The School Programming Leadership Team reviews data quarterly to ensure that these conversations and support plans are happening. Beginning August 2026, ECE will strengthen its targeted postsecondary-readiness support process by disaggregating student-level data to identify students not on track to meet postsecondary-readiness benchmarks.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 14.3.b

JCPS should develop, track, and report on postsecondary readiness score targets for subgroups.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Data Management Center is a Districtwide resource that contains a Name and Need Report for each school. This tracks school and student-level data for postsecondary readiness, allowing school teams to view student groups and plan for targeted interventions.

Our CTE Team and each school's Principal Supervisor meets with every Principal twice each year to review Name and Need data, ensuring that every student has a viable pathway to Postsecondary Readiness. During these meetings, we identify students in need of additional support, establish targeted action steps, and clearly define responsibility for implementing and monitoring those interventions. ECE monitors Postsecondary Readiness and monitors outcomes.

Corrective Action Planned

The Director of CTE, along with Director Post Secondary Planning and the Executive Director School Programming, will continue to meet with the High School Regional Team twice a year to review Name and Need data for each student and make plans for individual student success. The School Programming Team reviews data quarterly to monitor progress on these measures. Beginning August 2026, ECE will desegregate the data by student to review and establish areas requiring additional support to help students reach Postsecondary Readiness.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 14.4.a

JCPS should develop targeted graduation readiness supports and interventions to increase graduation rates among English Learners and Hispanic/Latino students.

Implementation Status: Partially Implemented

Corrective Action Already Taken

School teams receive graduation tracking six times a year, through Vital Signs, for all student groups. They analyze the data and develop targeted supports for students with the support of their regional team and Principal Supervisor.

Corrective Action Planned

Establishing Districtwide, targeted support is an area of opportunity for continued growth in graduation rates in partnership with the High School Regional Team and OML. The Director Career and Technical Education will set up regular meetings with OML to ensure that specific supports are created. The School Programming Team reviews data quarterly to monitor progress. CTE Instructional Leads will provide professional development for CTE Teachers around this developed support.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

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.

Recommendation 14.4.b

JCPS should develop, track, and report on graduation rate targets for subgroups.

Implementation Status: Partially Implemented

Corrective Action Already Taken

The JCPS Cascade Graduation Rate Cohort Analysis Tool allows the District to review individual students and status toward graduation throughout the year. The Postsecondary Planning Director and school's Principal Supervisor meet with high school Principals individually to review this tool and determine next steps for each student not on track for graduation.

Corrective Action Planned

The Director Career and Technical Education, the Director Postsecondary Planning, and the Executive Director School Planning will continue to have Predicted Graduation meetings with Principals and the high school regional team. The School Programming Leadership Team will monitor progress quarterly.

Target Completion Date: June 30, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming

Finding 14.5

KDE data on graduate outcomes at the district level is limited.

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.

Implementation Status: Fully Implemented

Corrective Action Already Taken

JCPS utilizes multiple reports (High School Feedback Report (HSFR), Career and Technical Education (CTE) Feedback Report, Labor Market Information (LMI), Kentucky Future Skills Report, Life Outcomes for High School Experiences, Dual Credit Scholarship Outcomes, Kentucky Students Right to Know) from the Kentucky Center for Statistics (KYSTATS), along with custom data requests, to help us better understand the performance of our students post high school. The Postsecondary Planning Team has also conducted trainings for high school Counselors focused on KYSTATS and National Clearinghouse Data.

Corrective Action Planned

The Director Postsecondary Planning Director and the Transition Readiness Specialist will continue to conduct training for HS Counselors focused on KYSTATS and National Clearinghouse Data.

Target Completion Date: June 24, 2027

Accountable Chief / Division: Katy DeFerrari, Chief of Strategy and Innovation

Operational Lead / Owner: Heather Benfield, Executive Director School Programming