



Kenton County School District | *It's about ALL kids.*

Issue Paper

DATE:

August 28, 2026

AGENDA ITEM (ACTION ITEM):

Consider/Approve: Federal District Funding Assurances Document

APPLICABLE BOARD POLICY:

4.92 Uniform Guidance

HISTORY/BACKGROUND:

Participation in Federal Education Program funding requires completion and approval of the annual KDE District Funding Assurances document. This document ensures that the district is in compliance with federal and state assurance guidelines before releasing federal funding for the 2027 school year.

FISCAL/BUDGETARY IMPACT:

\$ 7,481,555 Federal Budgeted Revenue

RECOMMENDATION:

Approval of the Federal District Funding Assurances for 2026-27.

CONTACT PERSON:

Susan Bentle

Principal



District Administrator



Superintendent

Kenton County (291) Public District - FY 2027 - District Funding Assurances - Rev 0

PLEASE READ THIS ENTIRE DOCUMENT CAREFULLY. By submitting these assurances, the public school district (District) Superintendent swears or affirms that the District complies with each of the written assurances set forth herein. These assurances are submitted by the Superintendent for the purpose of obtaining funding. District Superintendent understands that these assurances are relied upon by the Kentucky Department of Education for the purpose of distributing funding to District.

Kenton County (291) Public District - FY 2027 - District Funding Assurances - Rev 0

*** The LEA assures that it will comply with the following provisions:**

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| 1. The district meets all eligibility requirements to share in the distribution of the Support Education Excellence in Kentucky (SEEK) fund contained in KRS 157.310 to 157.440, including but not limited to the requirements for: (a) employment and compensation of all teachers; (b) minimum school terms; (c) maximum class sizes; and (d) maintenance of basketball teams for both boys and girls. | * Yes ▼ |
| 2. A comprehensive and current needs assessment, consistent with local board policy and 703 KAR 5:225, has been completed and supports the district improvement plan. The needs assessment is considered "comprehensive and current" if the required annual diagnostics have been completed. | * Yes ▼ |
| 3. The district has a planning policy in place for school councils to follow that describes the form and function of school improvement planning in the district as required by KRS 160.345 and 703 KAR 5:225. The district and all schools develop their improvement plans in accordance with this policy and with the involvement of representative groups, including required members of the needs assessment team. | * Yes ▼ |
| 4. The local school district reviews its district improvement plan at least annually and revises as needed. Implementation of activities and strategies described in the action plan are evaluated for impact on student performance and classroom practices and posted on the appropriate school or district website. The district improvement plan includes specific strategies based on data in the School Report Card to support schools. The district improvement plan includes specific strategies to support schools that have not met the goals of the Kentucky Summative Assessment (KSA). The Comprehensive District Improvement Plan (CDIP) for the district is posted to the district's website. As required by 703 KAR 5:225, before its district improvement plan is finalized, the district implements a process for meaningful stakeholder communication and input. The Comprehensive School Improvement Plan (CSIP) for each school is posted to the school's website and is on file in the district's central office for review. The district ensures that its schools comply with all public meeting and stakeholder input requirements for the CSIP as set forth in KRS 158.649, KRS 160.340, and 703 KAR 5:225. | * Yes ▼ |
| 5. A "Covered Program" as referenced throughout these assurances is any program operated by the District that is governed by state or federal law. The local school district will cooperate in carrying out any evaluation of any Covered Program, conducted by or for the Kentucky Department of Education (KDE), or the U.S. Department of Education, and consistent with KRS 156.210, will ensure that the Commissioner of Education has access to the papers, books and records of all school officials in the district. | * Yes ▼ |
| 6. The local school district will administer each Covered Program in accordance with all applicable statutes, regulations, program plans, and applications. | * Yes ▼ |
| 7. As required by applicable law, the local school district will consult with private school officials in a timely and meaningful way to assure equitable participation of children and/or teachers in the private schools. | * Yes ▼ |

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| 8. | The local school district will coordinate and collaborate with other agencies as required by the Every Student Succeeds Act (ESSA) or its successors Title I, Parts A, C, and D; ESSA or its successors Title II, Parts A, B and D; ESSA or its successors Title IV, Part A, Title VII, Title X; Part C, the Individuals with Disabilities Education Act (IDEA); and the Carl D. Perkins Vocational and Technical Education Act of 2006 (Perkins) or its successor. | * Yes ▼ |
| 9. | The local school district will adopt and use proper methods of administering the Covered Programs, including: implementation of obligations, the correction of deficiencies in program operations as identified through technical assistance, program audits, monitoring or evaluation, and the adoption of written procedures for the receipt and resolution of complaints alleging violations of law in the administration of such programs. | * Yes ▼ |
| 10. | For all Covered Programs, the local school district will: <ul style="list-style-type: none"> a. Provide timely program reports to the Kentucky Department of Education on activities and expenditures, including reports requested by the U. S. Department of Education; and b. Maintain records, provide information, and afford access to the records as the Kentucky Department of Education or the applicable federal agency may deem necessary to carry out any Covered Program responsibilities. | * Yes ▼ |
| 11. | The local school district will comply with all applicable provisions of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; and the Age Discrimination Act, collectively prohibiting discrimination on the basis of race, color, national origin, age, religion, marital status, sex, or disability. | * Yes ▼ |
| 12. | The local school district assures that its district improvement plan describes steps it will take to ensure equitable access to, and equitable participation in, Covered Programs by addressing the special needs of students, teachers, and other program beneficiaries in order to overcome barriers to equitable participation, including gender, race, color, national origin, disability, and age. [General Education Provisions Act (GEPA) Section 427]. | * Yes ▼ |
| 13. | The local school district will comply with the Single Audit Act as required by 2 C.F.R. Part 200 Subpart F. | * Yes ▼ |
| 14. | The local school district has program control of Covered Programs and holds legal title to property acquired with the funds received through participation in Covered Programs. The district will administer the funds and property as required by the authorizing law and for the purpose for which they are granted. The district retains program control and title to property acquired with the funds in the event of contractual arrangements made with other parties to administer Covered Programs. | * Yes ▼ |
| 15. | The local school district will use fiscal control and fund accounting procedures (Enterprise ERP) to ensure proper disbursement of and accounting for federal and state funds paid to the district under the Covered Programs. | * Yes ▼ |
| 16. | The local school district will submit an amendment prior to opening an object code series or to purchasing equipment that costs \$5,000 or more per unit after the initial budget has been submitted and approved. | * Yes ▼ |
| 17. | The local school district assures that: | * Yes ▼ |

- a. Unless the school district meets the requirements for an applicable exception, appropriated Federal funds have not been paid, and shall not be paid, by or on behalf of the local school district, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant, for entering any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.
- b. If applicable, the Superintendent shall complete and file Standard Form LLL "Disclosure Form to Report Lobbying" in accordance with its instructions for any payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

18. The superintendent shall require that the assurances and certifications contained herein be included in the award documents for all sub-grantees to the extent applicable to sub-grants.

* Yes ▼

19. Federal funds received under Covered Programs are used only to supplement state and local funding of programs, and in no case supplant funds from non-federal sources.

* Yes ▼

20. If any project involves construction, the project is in compliance with state requirements for the construction of school facilities; and, in developing plans for construction, due consideration is given to excellence of architecture and design, compliance with the Americans with Disabilities Act and standards prescribed by the Secretary under Section 504 of the Rehabilitation Act of 1973 to ensure that facilities constructed with the use of federal funds are accessible to and usable by individuals with disabilities [GEPA, Sec. 436].

* Yes ▼

21. Federal funds received will not be used to acquire equipment (including computer software) when such acquisition results in a direct financial benefit to an organization representing the interests of the school district or its employees or any affiliate of such organization [GEPA, Sec. 436].

* Yes ▼

22. The local school district maintains and implements procedures to minimize the time elapsing between receipt of federal grant funds by the school district and their disbursement by the school district (2 C.F.R. Part 200.305).

* Yes ▼

23. Any plan, budget, evaluation, periodic program plan, or report relating to the Covered Programs is made readily available to parents and other members of the general public for the purpose of public inspection (34 C.F.R. 76.304). The local school district will comply with the Kentucky Open Records Act set forth at KRS 61.870-884.

* Yes ▼

24. Children served in Covered Programs will have access to all state and locally funded instructional, social, health, transportation, and nutritional programs and services on the same basis as any other child, and have the opportunity to meet the same challenging content and performance standards as any other child.

* Yes ▼

25. The local school district will comply with 2 C.F.R. Part 200 - Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards as applicable.

* Yes ▼

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| 26. The local school district will comply with 2 C.F.R. Part 200 Subpart E as it relates to cost principles for federal fund uses. | * Yes ▼ |
| 27. The local school district will comply with 2 C.F.R. Part 200 Subpart D Property Standards (200.310-200.316). | * Yes ▼ |
| 28. The local school district will comply with the Debarment and Suspension requirements contained at 2 C.F.R. Parts 180 and 3485. | * Yes ▼ |
| 29. The local school district will comply with its Assurance of Compliance (Form HEW 441) or any court ordered desegregation plan that applies to an application for funds or Covered Programs. | * Yes ▼ |
| 30. The local school district will comply with the Gun-Free Schools Act at 20 U.S.C. §7961 and KRS 158.150. | * Yes ▼ |
| 31. The local school district will comply with 20 U.S.C. §7973 which prohibits smoking within any indoor facility owned or leased or contracted for, and utilized, by such person for provision of routine or regular kindergarten, elementary, or secondary education or library services for children, and KRS 438.345. | * Yes ▼ |
| 32. The local school district will comply with the Family Educational Rights and Privacy Act of 1974 (FERPA) at 34 C.F.R. Part 99, Kentucky Family Education Rights and Privacy Act (KRS Chapter 160.700 to 160.731), Children's Online Privacy Protection Act (1998) and accompanying rule (20 U.S.C. §1232h 34 C.F.R. Part 98), and the Protection of Pupil Rights Amendment (PPRA) at 20 U.S.C. §1232h. This includes required annual notifications to parents and eligible students as required by FERPA and PPRA. | * Yes ▼ |
| 33. The local school district will comply with the Procurement Standards as described in 2 C.F.R. §200.318-200.327. | * Yes ▼ |
| 34. The local school district shall certify that no policy of the district or the school prevents or otherwise denies participation in constitutionally protected prayer in the public schools (K-12) (20 U.S.C. §7904). The District affirms that it is aware that 704 KAR 3:365 establishes the process that is used for the receipt and resolution of complaints against a LEA that allegedly denies a person, including a student or employee, the right to participate in constitutionally protected prayer. The District affirms that any complaint made against the District regarding constitutionally protected prayer activities will be forwarded to KDE as required by 704 KAR 3:365 so that it may be reviewed and reported to the United States Department of Education as required by Section 8524(b) of the ESEA | * Yes ▼ |
| 35. The local school district shall comply with all provisions of KRS 158.649 relating to the reduction of achievement gaps among student populations. | * Yes ▼ |
| 36. The local school district has and shall maintain a technology plan to support the technology initiatives that are funded through various federal and state programs including the Every Student Succeeds Act (ESSA) or its successor, the Universal Service Administrative Company (USAC) E-Rate program, and the Kentucky Education Technology System (KETS) program. | * Yes ▼ |
| 37. The local district assures that all students have and shall continue to have access and opportunity to learn the standards contained in the Kentucky Academic Standards (KAS) in its entirety. 704 KAR Chapter 8. | * Yes ▼ |
| 38. The local district assures that all students have met the minimum graduation requirements set forth in 704 KAR 3:305 upon issuance of a high school diploma by the school district. | * Yes ▼ |
| 39. The local district assures that all students in grades 6-12 have an individual learning plan (ILP) that meets the requirements of KRS 158.6459 and 704 KAR 3:305. | * Yes ▼ |

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| 40. The local district assures that all students in grades K-12 enrolled in an alternative education program have an Individual Learning Plan Addendum that meets the requirements of KRS 160.380 and 704 KAR 19:002. | * Yes ▼ |
| 41. As it relates to student interventions, the local district assures: | * Yes ▼ |
| <ul style="list-style-type: none"> a. A high school student whose highest score on the college admissions examination required by KRS 158.6453 in English (Writing), reading, or mathematics is below the systemwide standard established by the Council on Postsecondary Education for entry into a credit-bearing course at a public postsecondary institution without placement in a remedial course or an entry-level course with supplementary academic support shall be provided the opportunity to participate in accelerated learning designed to address his or her identified academic deficiencies prior to high school graduation. KRS 158.6459(1). b. Each high school, in collaboration with the local district, develops and implements accelerated learning that allows a student's learning plan to be individualized to meet the student's academic needs based on an assessment of test results and consultation among parents, teachers, and the student; May include changes in a student's class schedule. KRS 158.6459(2) c. By February 1 of each year, the school-based decision making council, or the principal if there is not a council, with the involvement of parents, faculty, and staff shall set each school's targets for eliminating any achievement gap and submit them to the superintendent for consideration. The superintendent and the school-based decision making council, or the principal if there is not a council, shall agree on the targets before they are submitted to the local board of education for adoption. KRS 158.649(4). | |
| 42. The local district assures that all courses in the local course catalog are linked to Kentucky's Uniform Academic Course Codes. 704 KAR 3:540. | * Yes ▼ |
| 43. The local district assures that a library media center has been established in every elementary and secondary school, that a school librarian is employed to organize, equip, and manage the operations of the school media library, and that the school librarian holds the appropriate certification in accordance with KRS 161.020, 161.030, and 158.102, and provides high quality library media programming as defined in KDE's Beyond Proficiency. | * Yes ▼ |
| 44. The local district assures that all K-3 programs meet the requirements of 704 KAR 3:440, and that each primary school program includes the following attributes: developmentally appropriate educational practices; multiage and multiability classrooms; continuous progress; authentic assessment; qualitative reporting methods; professional teamwork; and positive parent involvement. KRS 158.031 | * Yes ▼ |
| 45. The local district assures the adoption of established policies, and the specific criteria provided in KRS 158.6453, on the promotion of advanced coursework or accelerated learning in language arts, mathematics, social studies, and science by grade level for students in grades 4-12. When practicable, the school shall offer advanced coursework in the listed content areas for students in grades 4-12. | * Yes ▼ |

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| <p>46. The local district assures that for any courses it identifies as an advanced placement course as provided in 704 KAR 3:510: (1) the course is identified as an advanced placement course by the College Board; (2) the course includes the content as described in the College Board overview, description, and recommended course syllabus for the applicable course; (3) the course is aligned with Kentucky's Academic Expectations as established in KRS 158.6451 and Kentucky's Academic Standards as established in 704 KAR Chapter 8; (4) the course prepares a student to take and be successful on the appropriate advanced placement examination administered by the College Board; and (5) the course accessible to all students.</p> | <p>* Yes ▼</p> |
| <p>47. In accordance with KRS 158.791, the district assures:</p> <p>That all elementary schools: Provide comprehensive schoolwide reading and mathematics instruction aligned to reading, writing, and mathematics standards required by KRS 158.6453 and 704 KAR Chapter 8; and provide a multitiered system of supports, as set forth in and required by KRS 158.305, KRS 158.8402 and 704 KAR 3:095; and</p> <p>That all middle and high schools: Provide direct, explicit instruction to students lacking skills in how to read, learn, and analyze information in key subjects, including language, reading, English, mathematics, science, social studies, arts and humanities, practical living, and career studies; Ensure that teachers have the skills to help all students develop critical strategies and skills for subject-based reading and grade-level appropriate mathematics; and provide a multitiered system of supports to ensure mathematics proficiency through high-quality mathematics instruction.</p> | <p>* Yes ▼</p> |
| <p>48. The district assures implementation of a comprehensive multitiered system of supports for students in grades K-12 that includes:</p> <ul style="list-style-type: none"> a. A tiered delivery system with a continuum of differentiated Tier 1 universal instruction, Tier 2 targeted intervention, and Tier 3 intensive intervention; b. Universal screening and diagnostic assessments to determine individual student needs and baseline performance; c. Interventions that are evidence-based, vary in intensity and duration based on individual student needs, implemented with fidelity by individuals most qualified to provide the interventions services, and monitored through a comparison of baseline data and ongoing progress data; d. Support for early intervention to address academic and behavioral issues; and e. Data-based documentation of assessments or measures of behavior, progress during instruction, regular evaluation, and individual progress reports shares with the parents of students summarizing the student's academic skills, behavior, and any intervention plans and services being delivered. 704 KAR 3:095 | <p>* Yes ▼</p> |
| <p>49. The district assures compliance with KRS 156.160 which requires every public middle and high school curriculum to include instruction on the Holocaust and other cases of genocide, as defined by the United Nations Convention on the Prevention and Punishment of the Crime of Genocide, that a court of competent jurisdiction, whether a court in the United States or the International Court of Justice, has determined to have been committed by applying rigorous standards of due process.</p> | <p>* Yes ▼</p> |

50. If schools adopt a curriculum for human sexuality or sexually transmitted diseases, they comply with the requirements of KRS 158.1415.	* Yes ▼
51. As required by the Every Student Succeeds Act, the school district assures that its employees, contractors, or agents, shall not assist a school employee, contractor, or agent in obtaining a new job, apart from the routine transmission of administrative and personnel files, if the individual or school district knows, or has probable cause to believe, that such school employee, contractor, or agent engaged in sexual misconduct regarding a minor or student in violation of the law. [20 U.S.C.A. 7926]	* Yes ▼
52. The district ensures data collection and reporting requirements are met as defined in state or federal law. This includes ensuring collection, reporting and quality control measures are in place within schools. Examples include: school and district report cards (ESSA S.1177(h); KRS 158.6453 and 703 KAR 5:140), biennial federal Civil Rights Data Collection (20 U.S.C. 3413(c)(1)). Reporting requirements for school and district report cards include publishing links to the report cards on the applicable school and district websites. [703 KAR 5:140 Section 4(1)]	* Yes ▼
53. The local district acknowledges that it must be registered with the <u>System for Awards Management</u> and agrees to maintain an active registration.	* Yes ▼
54. The local district ensures that Title I, Part A funds received under ESEA section 1111(g)(1)(B) will be used to: 1) identify that any low-income and minority children enrolled in schools assisted under Title I, Part A are not served at disproportionate rates, as compared to non-Title I schools, by ineffective, out-of-field, or inexperienced teachers; and, 2) Work in consultation with the State to improve any identifiable gaps between the rates of students taught by ineffective, out-of-field, or inexperienced teachers at Title I and non-Title I schools.	* Yes ▼
55. The district assures that it will comply with KRS 158.305(5)(b) and KRS 158.8402(5)(b) which requires the adoption of a high-quality instructional resource for reading and mathematics that is determined by the Kentucky Department of Education to be reliable, valid, and aligned to the Kentucky Academic Standards in 704 KAR Chapter 8.	* Yes ▼
56. The district assures that all teachers of students in K-3 shall be trained on any reading and mathematics diagnostic assessment and universal screener selected by the superintendent or public charter school board prior to administration of the assessment, as required in KRS 158.305(5)(c) and KRS 158.8402(5)(c).	* Yes ▼
57. The district assures that a universal screener measuring the essential components of reading that is determined by the Department of Education to be reliable and valid shall be administered by the school district within the first forty-five (45) days of the school year for all kindergarten students, within the first thirty (30) days for students in grades 1-3, and within the final fourteen (14) days of instruction for students in K-1, as required by KRS 158.305(6).	* Yes ▼
58. Based on the results of the early literacy universal screener, if a student's rate of progress toward proficient performance in reading needs accelerated interventions, the district assures that it shall provide: (a) Enrichment programs through grade three (3) using evidence-based reading instruction and other strategies; (b) Intensive instructional services, progress monitoring measures, and supports to students through grade three (3); and (c) Parents and legal guardians of students identified for accelerated interventions in reading in kindergarten through grade three (3) with a "Read at Home" plan, including information on how to participate in regular parent-guided home reading.	* Yes ▼

59. The district assures that if a student in grade 3 does not score in the proficient performance level or higher in reading on the Kentucky Summative Assessment (KSA), the local school district shall provide: (a) 1. Enrichment programs in grade four (4) using evidence-based reading instruction and other strategies; or 2. Intensive instructional services, progress monitoring measures, and supports to students in grade four (4); and (b) Written notification of the interventions and supports described in paragraph (a) of this subsection to the parent or legal guardian of the student, including a description of proposed interventions and supports to be provided (KRS 158.305(10)).
60. Beginning in the 2026-2027 school year, the district assures that the superintendent has selected and implemented a universal screener and diagnostic assessment for K-3 mathematics that is determined by the Kentucky Department of Education to be valid and reliable for implementation (KRS 158.8402(5)).
61. Beginning with the 2026-2027 school year, the district assures that a mathematics universal screener, determined by the KDE to be valid and reliable, shall be given in the first thirty (30) calendar days of the school year to each student in K-3 (KRS 158.8402(6)).
62. Based on the results of the mathematics universal screener, the district assures that students in K-3 determined to be at risk for not meeting grade-level benchmarks shall be given a mathematics diagnostic assessment, determined by the KDE to be valid and reliable, in the first forty-five (45) calendar days of the school year. (KRS 158.8402(7))
63. The district assures that a mathematics improvement plan shall be developed and implemented in the first sixty (60) calendar days of the school year by a mathematics improvement team for any student in K-3 identified as needing accelerated interventions to progress toward proficient performance in mathematics.
64. Beginning in 2026-2027, the district assures that if a student's rate of progress toward proficient performance in mathematics needs accelerated interventions as demonstrated by the results of an approved universal screener and mathematics diagnostic assessment, the local school district shall provide: (a) Enrichment programs using evidence-based mathematics instruction and other strategies; (b) Intensive instructional services, progress monitoring measures, and supports; and (c) Parents and legal guardians of students identified for accelerated interventions in mathematics with information on how to encourage mathematics success at home. (KRS 158.8402(9))

* Yes ▼

* Yes ▼

* Yes ▼

* Yes ▼

* Yes ▼

* Yes ▼

English Learners

In accordance with the Title VI of the Civil Rights act of 1964 and the Equal Educational Opportunities Act (EEOA), the LEA must provide an English language assistance program that allows for English learners to participate meaningfully and equally in educational programs and services.

To meet the obligations under Title VI and EEOA the LEA shall:

65. Provide an English language assistance program that allows for English learners to participate meaningfully and equally in educational programs and services.
66. Identify and assess all EL students in need of language assistance in a timely, valid, and reliable manner.
67. Provide EL students with a language assistance program that is educationally sound and proven successful.

* Yes ▼

* Yes ▼

* Yes ▼