

# Blending & Braiding: How to consolidate & coordinate

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What is braiding?  
What is blending?



# Braiding

- ▶ Braiding: “Financial assistance from several sources is coordinated... to support a single initiative or strategy, while each individual award maintains its award specific identity.”
- ▶ No statutory authority necessary
- ▶ Good project management
- ▶ Best practice

# Blending

- ▶ Blending: “...financial assistance is combined [emphasis added] under a single set of reporting and other requirements, and resources contributed from each individual funding stream lose their original award-specific identity.”
- ▶ Requires specific statutory authorization
- ▶ Single project can have both Blended and Braided Funding

# Blended Funds

## ED Q&A 6/25/15

- ▶ More than one agency or program
- ▶ Same or related activities
  - ▶ Requires prior approval



# Blending and / or Braiding

- ▶ Steps
  - ▶ Needs assessment
  - ▶ Consolidated project plan
    - ▶ Collaboration of stakeholders
  - ▶ Consolidated budget
  - ▶ Monitor performance outcomes

# Blended - Steps

- ▶ If no statutory authority - waivers available?
- ▶ Focus on outcomes
- ▶ Simplify accounting



# Considerations - Blended (cont.)

- ▶ Determine project scope
- ▶ Identify suitable partners
- ▶ Determine sufficient resources
- ▶ Identify potential barriers
- ▶ Identify goals and desired outcomes



# Source:

- ▶ A Guide for Policy Makers and Practitioners. AGA Intergovernmental Partnership  
<https://www.agacgfm.org/AGA/Intergovernmental/documents/BlendedandBraidedFunding.pdf>

# EDGAR ESSA Consolidated Administration Time and Effort



# General Considerations

- ▶ EDGAR 34CFR 76.580
  - ▶ Braiding - State and Subgrantees
    - ▶ State and subgrantees coordinate each project with similar ones in same locale



# ESSA Section 1111 - Braiding

- ▶ ESSA Title I A plans coordinated with other ESSA programs AND:
    - ▶ IDEA
    - ▶ Rehabilitation Act 1973
    - ▶ Perkins
    - ▶ WIOA
    - ▶ Head Start
    - ▶ Adult Education
    - ▶ McKinney-Vento
- (and others)

# ESSA Sections III, 8302 Braiding

- ▶ Consolidated State Plan
  - ▶ Cross program coordination
  - ▶ Flexibility
  - ▶ Enhance integration of programs

# ESSA 8303 - Braiding Consolidated Reporting



# Consolidated Administration Under ESSA



# ESSA Consolidated Administration - Blending

- ▶ Combine administration for all ESSA programs
  - ▶ Not McKinney-Vento, Perkins, IDEA, Head Start, Agriculture
- ▶ Applies only to Administration
  - ▶ No federal definition
  - ▶ Cap on %
  - ▶ Statute
  - ▶ SEA under an LEA
  - ▶ “Necessary and Reasonable” amount



# Allowable Uses

- ▶ Administration of any contributing program
- ▶ Coordination with federal and non federal programs - Braiding
- ▶ Peer review
- ▶ Model programs information
- ▶ TA - any ESSA program
- ▶ Training personnel - Monitoring and auditing
- ▶ CAROI
- ▶ Fiscal support teams

# Benefits of Consolidating Admin

- ▶ Need not distinguish administration costs among covered programs
- ▶ No separate records
- ▶ Time and effort records?
  - ▶ Single Cost Objective
  - ▶ If you work 100% on ESSA consolidated administration, then do semi-annual certification

# Prerequisites

- ▶ LEAs =

- ▶ Need approval of the SEA
- ▶ SEA must set % cap for administration, OR use “necessary and reasonable amount”

- ▶ SEAs =

- ▶ Need to demonstrate that majority of operating expenses come from non-federal sources

# Schoolwide Schools

## Sec. 1114

### Blending



# Schoolwide Requirements

## Sec. 1114(a)(1)-(2)

- ▶ Consolidate and use funds, together with other federal, state, and local funds to upgrade the entire educational program of a school
- ▶ Pre-requisite: 40% poverty
  - ▶ **(NEW)** State may waive (previously waivable only by the Secretary, Secretary may still waive under Sec. 8401)
- ▶ Not required to identify:
  - ▶ Eligible students; or
  - ▶ Individual services as supplemental

# Schoolwide Program Plan Sec. 1114(b)

Combines components and elements of prior requirements:

1. Developed during 1 year period (LEA can determine less time is needed);
2. Existing schoolwide may continue but must amend plan;
3. Developed with involvement of parents and other members of the community (teachers, principals, school leaders, paraprofessionals, etc.);
4. Remains in effect but shall be regularly monitored and revised as necessary based on student needs;
5. Is available to the public in an understandable format and, to the extent practicable, in a language parents can understand;

# Schoolwide Program Plan (cont.)

## Sec. 1114(b)

6. Is developed in coordination with other Federal, State, and local services, resources, and programs;
7. Is based on a comprehensive needs assessment; and
8. Includes strategies to address school needs, including
  - Providing a “well-rounded education”;
  - Counseling and school-based mental health services;
  - Post-secondary and workforce preparation including career and technical education;
  - Consolidation of funds;
  - Schoolwide tiered model (behavior and EIS); etc.

# The Importance of the Schoolwide Plan





# The Schoolwide Plan

- ▶ Compliant plan - critical



# The Schoolwide Plan (cont.)

- Provides information to auditors and monitors about which programs are included if there is a consolidation.
- Auditors will hold the school accountable in accordance with whether:
  - The plan's activities meet the intent and purposes of the consolidated federal programs;
  - The school is implementing the activities detailed in the plan.
- Depending on the level of consolidation, the LEA may attribute expenditures to particular fund sources without regard to whether they actually support particular fund source as long as the expenditures support the schoolwide plan.

# Annual Evaluation

- ▶ Must annually evaluate the implementation of, and the results achieved by, the program.
- ▶ Amend if appropriate
- ▶ If SW under NCLB - keep but amend



# Mechanics of Funding Consolidation



# Levels of Schoolwide Consolidation

- 1. Only Title I funds support the schoolwide plan; no funds are consolidated**
  - ▶ Least amount of flexibility
  - ▶ EDGAR applies
- 2. Consolidates only federal funds**
  - ▶ Moderate amount of flexibility
  - ▶ EDGAR applies
- 3. Consolidates state, local, and federal funds**
  - ▶ Most amount of flexibility
  - ▶ Loss of federal identity but state/local rules still apply

# How should the process of consolidation begin?

- ▶ Who makes the decision to consolidate?
- ▶ Starting points?
- ▶ School responsibilities?
- ▶ District responsibilities?
- ▶ Training and policies and procedures

# What does it mean to consolidate funds in a schoolwide program?

- ▶ Lose their individual identity and treated like a single “pool” of funds.
- ▶ What does “pool” mean?
  - ▶ Not required to combine funds in a single account or “pool” with its own accounting code
  - ▶ Used figuratively to convey the idea that a schoolwide program has the use of all consolidated funds to support schoolwide program

# What programs can be consolidated?

- ▶ U.S. Department of Education Programs
  - ▶ Formula Grants: Can consolidate funds from nearly every noncompetitive, formula grant
    - ▶ Title I, Part A; Migrant Education Program (Title I, Part C); Preparing, Training and Recruiting Effective Teachers and Principals (Title II, Part A); English Language Acquisition (Title III, Part A); Perkins; and the IDEA
  - ▶ Discretionary Grants: Can consolidate funds it receives from discretionary grants
    - ▶ 21<sup>st</sup> CCLC & Adult Education
    - ▶ Must still carry out activities described in the application under which the funds were awarded
  - ▶ **Must be named in schoolwide plan!**



# What programs can be consolidated?

- ▶ Other federal awarding agencies
  - ▶ Cannot consolidate
  - ▶ Authority to consolidate extends only to funds administered by ED
    - ▶ National School Lunch & Head Start
- ▶ State and local programs
  - ▶ Can consolidate state and local funds except for special allotments
  - ▶ CAUTION - STATE RULES MAY RESTRICT

# Special Restrictions

- ▶ IDEA

- ▶ Programmatic Responsibilities

- ▶ IDEA funds can be consolidated but all programmatic protections must apply, including the provision of FAPE.
    - ▶ In other words, IDEA services must be provided, but not necessary to track IDEA dollar to IDEA service.

- ▶ Restrictions on Consolidation

- ▶ Amount of funds cannot exceed the number of students with disabilities multiplied by per-disabled-child amount of Part B funds received by LEA.
    - ▶ What about the non-consolidated funds?
      - ▶ Any non-consolidated funds can be spent to ensure that programmatic requirements are met and all children with disabilities are served.
      - ▶ But must track those separately.

# Accounting for Funds in a Schoolwide Consolidation

- ▶ Generally, the LEA accounts for all expenditures under the schoolwide plan as expenditures from the consolidated pool.
- ▶ LEA may attribute expenditures to particular fund sources without regard to whether they actually support the particular fund source.
  - ▶ As long as expenditures support the schoolwide plan.
  - ▶ Depends on level of consolidation.
- ▶ But LEAs must still demonstrate that consolidated funds have been expended.
- ▶ May use any reasonable method, but there are at least three options approved by ED.

# Reporting with SW Consolidation

Proportional Basis (or “any other reasonable method”)

- Use for identifying:
  - Carryover
  - Amount of unused non-federal funding
  - MOE
  - Comparability
  - Reporting expenditures back to State or USDE
  - State Per Pupil Expenditure (SPPE)

# Benefits of Consolidation



# Formula Grants

## All Types of Consolidation

- ▶ Not required to meet school-level statutory or regulatory requirements
- ▶ Need to address intents and purposes of combined programs AND ensure that the needs of the intended beneficiaries of these programs are addressed
- ▶ Example: Title II, Part A is consolidated
  - ▶ One purpose of Title II, Part A is to increase the number of effective teachers, principals, and assistant principals
  - ▶ Can spend consolidated funds on recruitment initiatives to increase the number of effective teachers if plan allows for it

# Formula Grants (cont.)

## All Types of Consolidation

- ▶ Must still meet accountability provisions of ESEA, including:
  - ▶ Annual review by district;
  - ▶ Potential identification for school improvement and appropriate corrective action; and
  - ▶ Accountability provisions required by ESEA waiver.
- ▶ Must also meet program-linked requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, and various programmatic fiscal requirements
  - ▶ But consolidation may change some of those fiscal requirements!

# Discretionary Programs

## All Types of Consolidation

- ▶ Less flexibility than formula grants
- ▶ Not enough to simply meet the intents and purposes of the discretionary grant
- ▶ Must still carry out all activities described in the application
- ▶ BUT may use any of the combined funding sources to do so



# Flexibility in Use of Funds


## ▶ Full Consolidation

- ▶ Federal funds lose their identity
- ▶ Not required to be spent in accordance with specific program requirements or cross-cutting federal requirements (EDGAR)

## ▶ Federal Consolidation Only

- ▶ Funds lose program-specific identity but not federal identity
- ▶ Consolidated federal funds must be used to address the specific “educational needs” of the school identified in needs assessment and comprehensive plan
- ▶ EDGAR still applies

# Use of Funds - Basic Operational Expenses

- ▶ Basic operational expenses includes maintenance and repairs, landscaping, and custodial services
- ▶ Again, depends on level of consolidation
  - ▶ Full Consolidation - Allowable, because it is impossible to attribute specific activities to consolidated federal funds
  - ▶ Federal Only - Unallowable, because consolidated funds must be used to address educational needs identified in needs assessment and articulated in plan
- ▶ Be careful of supplement, not supplant 
  - ▶ School must receive all the state and local funds it would otherwise *need to operate* in the absence of Federal funds

# Time and Effort

- ▶ Full Consolidation:
  - ▶ **FLEXIBILITY: No Time and Effort!!!!**
- ▶ Federal only
  - ▶ Time and Effort still required
    - ▶ SWP considered single cost objective



# Procurement Flexibility

- ▶ Full consolidation:
  - ▶ Again, because federal funds lose their federal identity in a consolidated pool, federal procurement requirements do not apply if using consolidated funds.
  - ▶ Must follow state and local rules.
  - ▶ Example:
    - ▶ EDGAR prohibits specifying a brand name on a request for quotations without including “or equal”
    - ▶ Look to state or local rules
    - ▶ If no prohibition, school can request a brand name for procurement
- ▶ Federal only:
  - ▶ EDGAR rules still apply because no loss of federal identity

# Inventory Management Flexibility

- ▶ Full Consolidation:
  - ▶ School is generally expected to follow state and local rules rather than federal rules for property purchased with consolidated funds.
  - ▶ Example: A school purchases \$6,000 piece of equipment with consolidated funds, it is not required to keep property records required by EDGAR.
  - ▶ Must still keep records identifying property as schoolwide property and documentation that the equipment was purchased with consolidated funds.
    - ▶ Allows LEA and school to justify lack of more restrictive requirements.
- ▶ Federal only: Inventory management rules would still apply.

# Sources

- ▶ Non-Regulatory Guidance:

“Title I Fiscal Issues,” February 2008 (replacing May 2006)

[www.ed.gov/programs/titleiparta/fiscalguid.doc](http://www.ed.gov/programs/titleiparta/fiscalguid.doc)

- ▶ Consolidating funds in schoolwide programs, MOE, SNS, Comparability, Grantbacks, Carryover

- ▶ ESEA Title I Schoolwide Guidance

- ▶ <https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>

# U.S. Department of Education - September 7, 2012

- ▶ Single Cost Objective - Blended Funding
  - ▶ Title I A - State Compensatory Funds for teacher teaching low achieving students
  - ▶ IDEA Special Education teacher - IDEA and local funds

# Equitable Services Under ESSA Section 1117

- ▶ Consultation must include:
  - ▶ “Whether to consolidate [emphasis added] and use [Title IA funds]... in coordination with eligible funds for services to private school children under... [other] ESSA programs...”
- ▶ 1117b(1)(L)
  - ▶ Does consolidate here authorize Blending?
    - ▶ ED says no - only Braiding (see next slide)



# Equitable Services Under ESSA Section 1117

- ▶ ED Guidance
  - ▶ This authorizes coordination → **Braiding**
- ▶ ESSA Non Regulatory Guidance Fiscal and Equitable Service
  - ▶ <https://www2.ed.gov/policy/elsec/leg/essa/essaguidance160477.pdf>

(Question 0-7)

# ESSA Section 1119

## Head Start - Braiding

LEA with early childhood programs coordinate with Head Start

- ▶ Systematic records transfer
- ▶ Channels of communication
- ▶ Meetings, teachers, parents, etc.
- ▶ Joint transition training
- ▶ ED Secretary, HHS Secretary Coordinate Regulations

# WIOA - Blending

- ▶ Workforce Innovation and Opportunities Act (WIOA), Section 121(h)
- ▶ 19 Programs support infrastructure of one stop centers - Blending Funding



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