

Blending and Braiding of Funds

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Federal Programs and Oversight

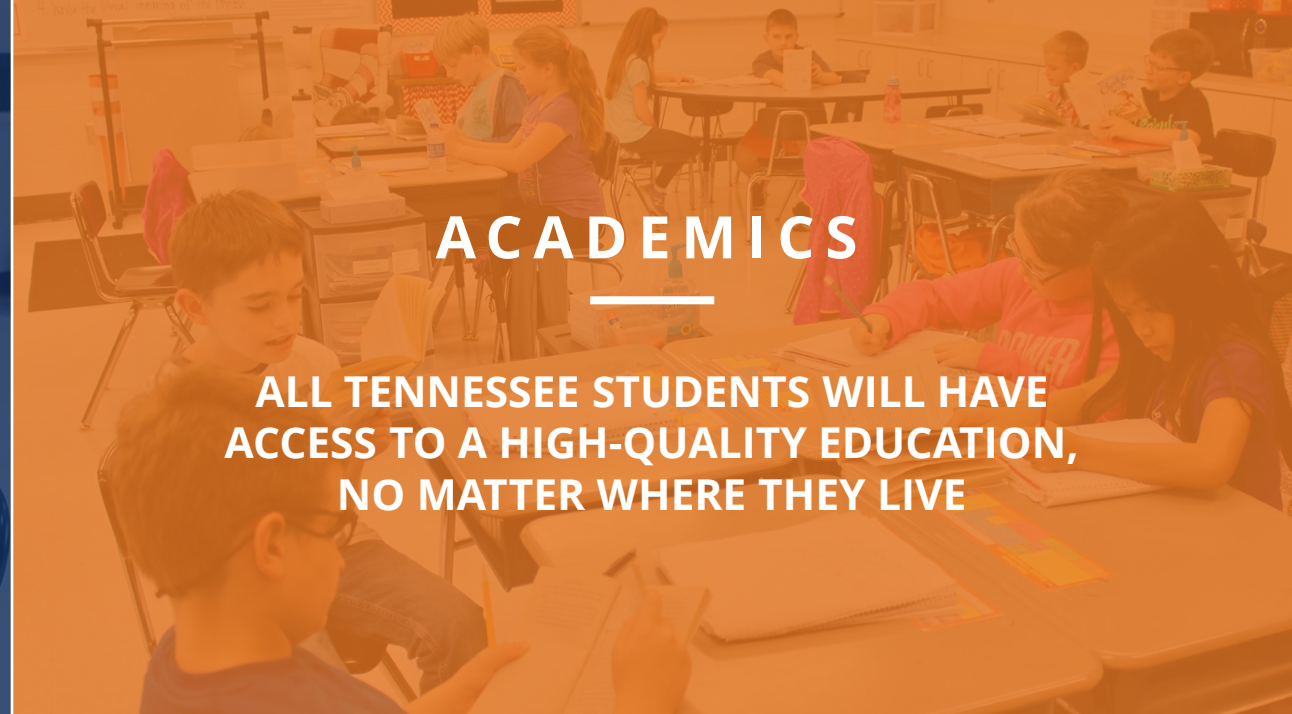
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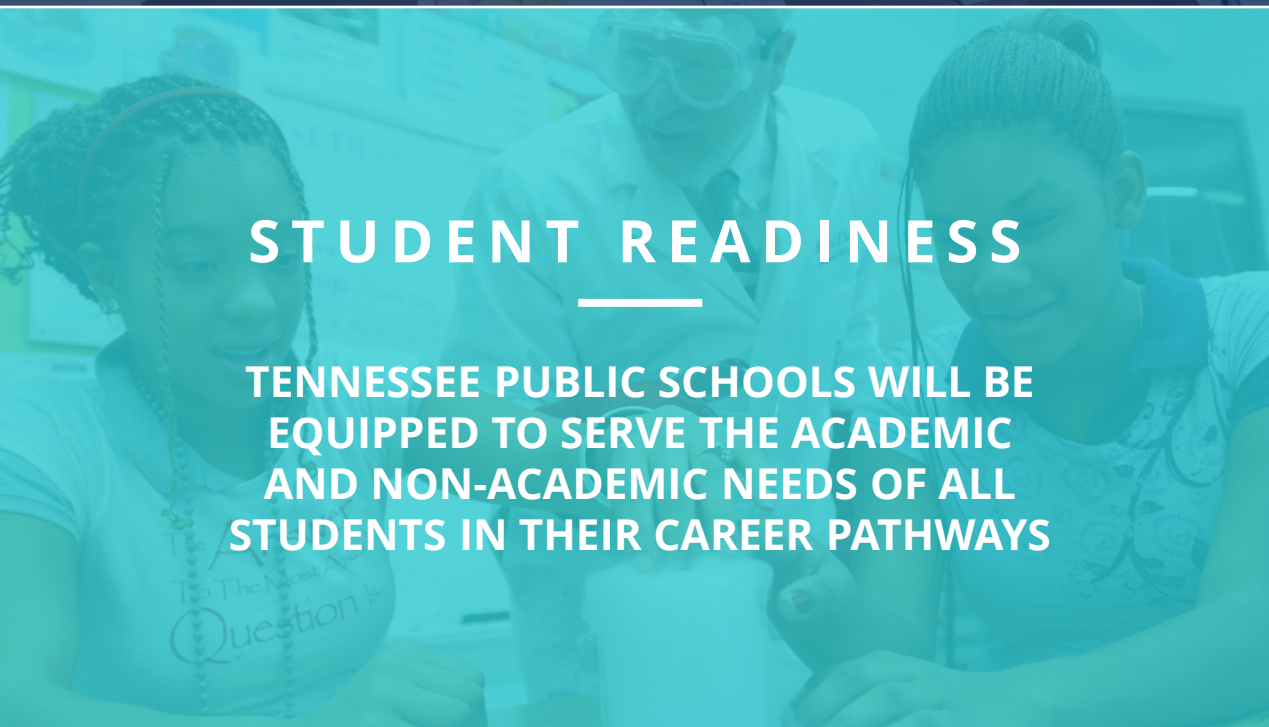
BEST FOR
ALL

We will set all students on a path to success.



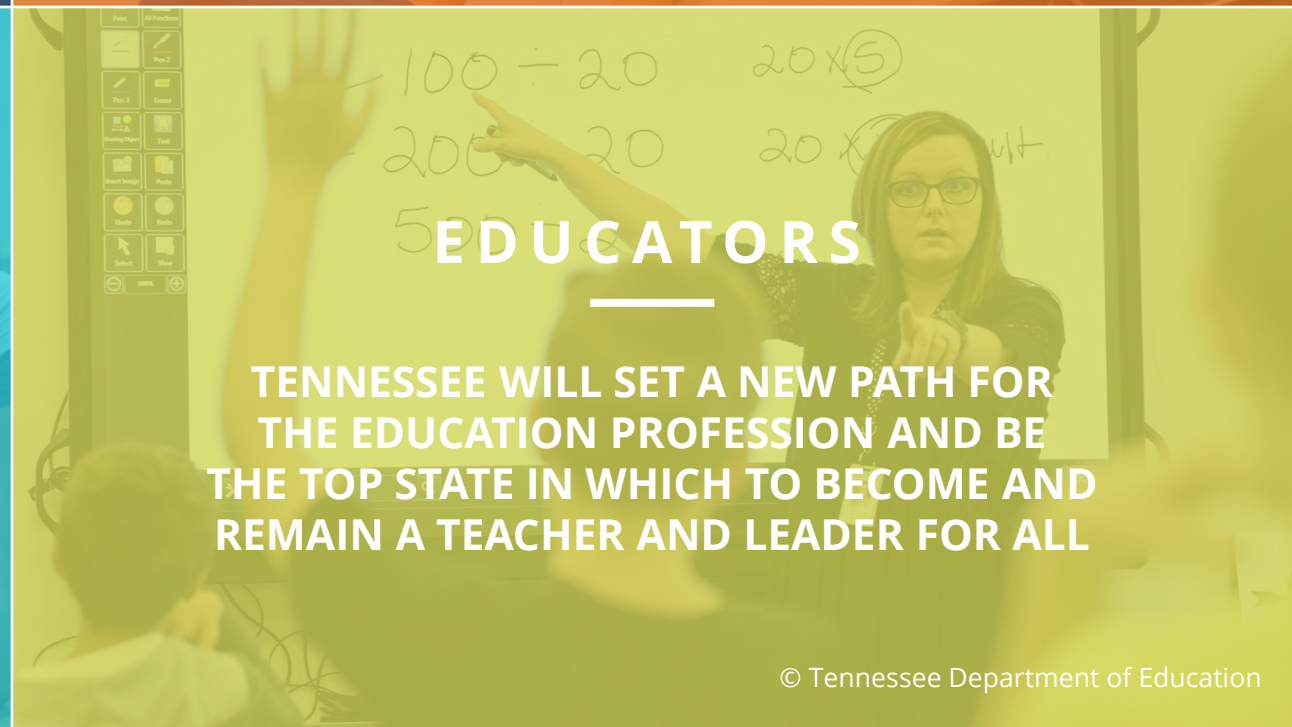
ACADEMICS

ALL TENNESSEE STUDENTS WILL HAVE ACCESS TO A HIGH-QUALITY EDUCATION, NO MATTER WHERE THEY LIVE



STUDENT READINESS

TENNESSEE PUBLIC SCHOOLS WILL BE EQUIPPED TO SERVE THE ACADEMIC AND NON-ACADEMIC NEEDS OF ALL STUDENTS IN THEIR CAREER PATHWAYS



EDUCATORS

TENNESSEE WILL SET A NEW PATH FOR THE EDUCATION PROFESSION AND BE THE TOP STATE IN WHICH TO BECOME AND REMAIN A TEACHER AND LEADER FOR ALL



Agenda

- Overview of Blending and Braiding
- Blending Examples
- Braiding Examples
- Fiscal Considerations
- Resources



Overview of Blending and Braiding



What is Blending and Braiding?



Blended funding is **combined** into one funding stream to meet one purpose. Individual funding streams lose program identity.



Braided funding is **coordinated** to meet one purpose. Individual funding streams maintain an identity for eligibility and reporting.

Which Funds May be Blended and Braided?

Blending

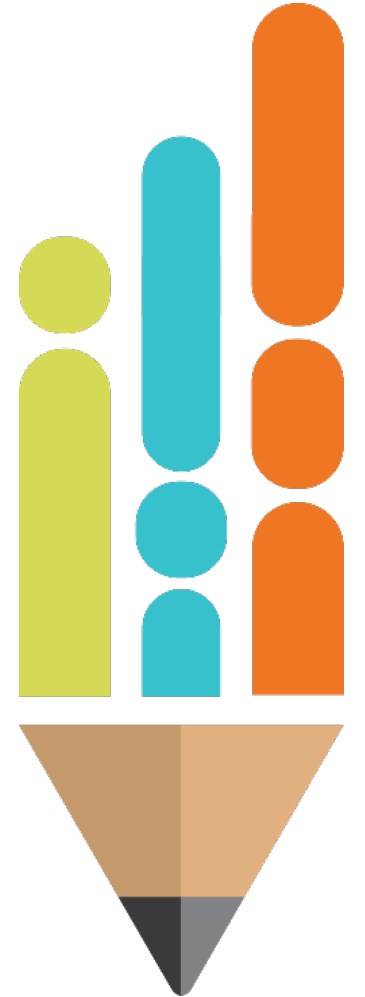
- Unrestricted state and local funds
- Federal funds:
 - ESEA Titles I, I-C, II, III, IV, and V
 - IDEA, including IDEA CEIS

Braiding

- State and local funds
- Federal funds:
 - ESEA Titles I, I-C, II, III, IV, and V
 - Extended Learning (21st CCLC and LEAPs)
 - Perkins CTE
 - IDEA, including IDEA CEIS
 - CARES Act, GEER, and ESSER funds

Why Blend or Braid Funds?

- Allows LEAs and schools to “do more with less” and leverage resources
- Allows local education agencies (LEAs) and schools to *fund the plan* rather than *plan for the funds*
- Better serve students with complex needs by providing access to streamlined services rather than services from multiple, separate programs
- Can reduce overlap and duplication of services and time and effort



Why Blend or Braid Funds?

- The decision on whether its appropriate to blend and braid funds is program- and situation-specific.
- The LEA Improvement Plan (InformTN) serves as a tool to connect various funding sources.
 - Reflect to Plan section
 - Needs Assessment
 - Goals

Status Approved	
	Completed
Prepare to Plan	✓
Explore Data	✓
Analyze Needs	✓
Reflect to Plan	✓
Upload Documents	✓
Develop Plan	✓

Blending and Braiding Steps



Plan

- Assess the needs of your district using tools such as InformTN.
- Identify programs to address needs and associated costs



Resource/Cost Allocation Methods

- Identify funding sources.
- Determine if costs are necessary or reasonable.



Report

- Verify consistency between the Consolidated Funding Application (CFA) and InformTN.

Blending Examples



Blending

- Financial assistance from two or more sources are **combined** into one funding stream.
- Funds lose their original award-specific identity and are tracked as one funding stream.
- Requires specific statutory authorization
- Allows for more integrated administration than braiding



Blended Funding Scenario 1

ESEA Schoolwide Consolidation:

- May include federal, state, and local funding.
- The school must be operating a Title I school-wide program.
- Funds are placed into a single pool to increase flexibility and are used to support the activities outlined in the school-wide plan.
- Funds included in consolidation lose their identity.
- Funds must be used to meet the intents and purposes of grant programs included in the consolidation.
- Some federal statutory and regulatory requirements can be eased at the school level.

Grant Source	Yes	No
Title I, Part A	X	
Title I, Part C	X	
Title II, Part A	X	
Title III, Part A	X	
Title IV, Part A	X	
Title IV, Part B	X	
Title V, Part B	X	
Perkins	X	
IDEA	X	
State/local	X	
School Lunch		X
Head Start		X



Blended Funding Scenario 1

- Schoolwide Consolidation Option 1: **Consolidate all Funds**
 - Funds lose their identity.
 - School-level program-specific requirements are no longer applicable.
 - Must meet the intent and purpose of the programs included.
 - No distinction between federal and non-federal funds.
 - Funds can be used to address any needs identified in the school-wide plan (may be non-educational).
 - Expenditures are not “tracked” back to specific programs within the pool.





Blended Funding Scenario 1

- Schoolwide Consolidation Option 2: **Consolidate Only School-level Federal Funds**
 - Funds lose their identity.
 - School-level program-specific requirements are no longer applicable.
 - Must meet the intent and purpose of the programs included.
 - Funds can be used to address the educational needs identified in the schoolwide plan.
 - Expenditures are not “tracked” back to specific programs within the pool.



Blended Funded Scenario 1

- Student example: EL, migratory child attending a Title I school that consolidates federal funds
- Funding Sources: Title I, Part A; Title I, Part C; Title II, Part A; Title III, Part A
- Cost Allocation: funds may pay for any activity that meet the student's need included in the schoolwide plan
 - The interventionist is paid from consolidated funds

Consolidated Costs:

- One interventionist provides supplemental push-in services for this student.
- The interventionist has been trained on strategies to utilize with EL and migratory students.
- The same interventionist supports this student and other students in after-school tutoring.


Blended Funding Scenario 2 – Hybrid Blending

Transferability:

- ESSA flexibility which allows LEAs to transfer certain funds to other programs.
- Transferred funds take on the character of the program they are transferred into.
 - This includes statutory set-asides, ranking and allocating in Title buildings, and carryover.
 - Funds appear blended to the grant reviewer and grantee. However, the funds maintain their original identify in federal reporting.

LEAs May Transfer All or Some Funds From	LEAs May Transfer Funds Into
Title II, Part A, Supporting Effective Instruction	Title I, Part A, Improving Basic Programs Operated by LEAs
Title IV, Part A, Student Support and Academic Enrichment	Title I, Part C – Education of Migratory Children
	Title I, Part D, Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk
	Title II, Part A, Supporting Effective Instruction
	Title III, Part A, English Language Acquisition Language Enhancement, and Academic Achievement
	Title IV, Part A, Student Support and Academic Enrichment
	Title V, Part B, Subpart 2, RLIS

Blended Funding



Benefits	Challenges
Less federal accountability	Requires statutory authority
Simplifies accounting	Requires upfront accounting adjustments
More flexible allowable uses of funds	
Focus on outcomes	



Braiding Examples





Braiding

- Financial assistance from two or more sources that are **coordinated** in order to support a single initiative or strategy.
- Each individual award maintains its award-specific identity and is tracked and reported as a separate funding stream through the entire process.
- No statutory authority is necessary.

Braiding and Allocability – C.F.R. §200.405

- Important administrative considerations when braiding funds:
 - Costs charged to each federal program, must be allocable to that program.
 - In other words, a federal program that funds a portion (or all) of a project must receive a benefit relative to the contribution it makes.
- This standard is met if the cost:
 - Is incurred specifically for the grant award;
 - Benefits both the grant award and other work of the grantee and can be distributed in proportions that can be reasonably approximated; and
 - Is necessary to the overall operation of the grantee and is assignable in part to the federal award in accordance with the principles in this subpart.



Direct Cost Allocation Principles – C.F.R. §200.405

- A cost that benefits two or more projects or activities in proportions that can be determined without undue effort or cost must be allocated to the projects based on the proportional benefit.
- A cost that benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved may be allocated or transferred to projects that are benefited based on any reasonable, documented basis.



Braiding Fiscal Considerations

- Still must follow supplement not supplant and maintenance of effort requirements.
- Federal funds must be spent properly on allowable costs.
- Internal controls must be in place to ensure accuracy, allowability, and allocability.
- There must be sufficient evidence to prove the funds were spent properly.
 - Financial records must be sufficiently detailed to identify the source and application of grant funds to the individual expenditure level.
 - Salaries and wages must be based on records that accurately reflect the work performed.
 - Must have complete and accurate inventory systems/records.



Braiding Scenario 1

- Schools in the LEA implement a multi-tiered system of support (MTSS) program in which a combination of funds are used to serve students.
- Funding Sources: Title I, Part A; Title II, Title III, Title IV, Part A; IDEA
- Cost allocation: each grant program expends funds on a specific aspect of the MTSS.
 - Individual expenditures are contained within an individual grant (i.e., no costs are shared between or among grants), the costs are charged to and claimed within each individual grant directly as planned.

Costs claimed as follows:

- Title I, Part A: Costs related to the screener, the assessments, and the intervention program
- Title II, Part A: Costs related to professional development on the intervention program for all teachers
- IDEA: Costs related to the supplemental intervention programming for children with disabilities
- Title III, Part A: Costs related to supplemental intervention programming for English Learners
- Title IV, Part A: Costs related to other materials and supplies for the program

Braiding Scenario 2

- One trained interventionist provides supplemental push-in services for EL and homeless students. The same interventionist supports these and other students in after-school tutoring.
- Funding Sources: Title I, Part A; Title II, Part A; Title III, Part A
- Cost allocation:
 - Includes both single grant expenditures and shared grant expenditures.

Costs claimed as follows:

- Title I-A and Title III: Interventionists' salary and benefits are charged based on time and effort

Grant	Costs	Percentage
Title I-A	\$40,000	40%
Title III	\$60,000	60%
Total	\$100,000	100%

- Title II, Part A: Professional development on effective strategies to use with ELs and homeless students.

Braiding

Benefits	Challenges
No statutory authority necessary	Each funding stream maintains its identity including eligibility criteria and scope of authorized activities
Allows LEAs to leverage funding from multiple sources to complete projects/programs that could otherwise not occur	Supplement not supplant requirements for each program still apply
Allows LEAs and schools to lessen duplicate efforts for a wholistic/comprehensive program	Must clearly document allocability

Resources

Resources

- [Federal Uniform Guidance – 2 C.F.R. 200](#)
- [ED: Transferability for State and Local Educational Agencies](#)
- [Federal Spending Handbook: Coordinated Spending Guide](#)
- [School-Wide Pool Overview](#)
- [FAQ School-Wide Pool](#)
- [Title I School-wide Consolidation Slides](#)
- [Blended and Braided Funding: A Guide for Policy Makers and Practitioners](#)
- [Braiding Funds to Enhance Title IV-A Program Efficiency and Outcomes](#)
- [ESEA Divisional Coordinators](#)





Questions?

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