



Network of State Turnaround and Improvement Leaders – Leadership Council

Thought Leadership Forum Brief: Braiding Federal Funds Under ESSA

March 2017

Thought Leadership Forum Series

The Center on School Turnaround (CST) at WestEd is hosting a series of online Thought Leadership Forums for state education agency (SEA) officials who are members of the Leadership Council of the Network of State Turnaround and Improvement Leaders. The forums are intended to highlight major considerations for turning around chronically low-performing schools, with particular attention to SEAs' broader improvement plans and implementation efforts under the Every Student Succeeds Act (ESSA).

The second forum, held on February 13, 2017, focused on “braiding” (coordinating) different federal funding sources under ESSA to support a specific initiative or state priority. The forum featured a presentation from two experts in federal education funding and programs, Melissa Junge and Sheara Krvaric, consultants with Federal Education Group, PLLC. Junge and Krvaric work with states, local education agencies (LEAs), and other education-related organizations to navigate federal laws, ensure legal and fiscal compliance, and maximize the impact of federal grants.

This brief summarizes the key ideas from the February 13 forum, offers recommendations to help SEA officials maximize the potential of federal funding, and lists the key resources shared.

Braiding Federal Funds Under ESSA: Key Considerations for SEA and LEA Leaders

Braiding funds means using multiple funding sources *in coordination* to support an initiative, in contrast to pooling, blending, or consolidating funds.¹ Federal grants can often support a wider range of activities than is commonly known. Title I is a flexible grant by design; the law omits a list of allowable uses of funds, thereby encouraging local officials to determine strategies to support their struggling students. The Title I grant can fund teacher training as well as student support across subjects, including dual- or concurrent-enrollment programs and advanced coursework. Title II and IDEA offer similar flexibility beyond their traditional uses; the former grant can support diverse talent management initiatives related to educator retention, advancement, and professional feedback, while the latter can be used for improved screening and progress monitoring. Table 1 depicts a specific applied example of braiding in which an LEA focuses on addressing chronic absenteeism through

¹ Through *braiding*, each funding source continues to be accounted for separately and spent only on permissible activities. The U.S. Education Department General Administrative Regulations (EDGAR) authorize braiding so long as the recipient follows federal spending rules and tracks how federal funds are spent (34 CFR §76.760). There are also federal rules outside of the U.S. Department of Education (e.g., Uniform Grant Guidance) that require LEAs to track federal spending in ways that can complicate braiding. For example, federal “time and effort” rules require LEAs to document that employees paid with federal funds worked on the grant that paid their salary (which can be hard to do if an employee works on an activity funded by multiple grants), but states can let LEAs know of the flexibility permitted under the law to minimize paperwork burdens in this area.

the coordinated use of Title I, Title II, Title IV, and IDEA Part B funds.

Braiding funds requires deliberate, strategic, and comprehensive planning. As Oregon’s Director of District and School Effectiveness described during the forum, instead of the traditional approach of “planning for funds,” braiding emphasizes “funding a plan” — one driven by an evidence-based needs assessment and informed by analysis and review of state and local data. ESSA affords SEAs and LEAs a unique opportunity to engage in this analysis and strategizing. The driving assumption is that as education officials design and implement their plans, they will depart from narrow views of what is permissible under particular grants and instead consider how their plan’s various pieces fit together to advance their larger goals.

Recommendations for Braiding Federal Funds

1. Provide activity-focused guidance. To effectively coordinate funding toward key improvement priorities, states need to know their options and offer clear guidance and support to their LEAs, who ultimately spend most of the money from ESSA’s largest programs. This guidance should emphasize effective spending options and shift away from narrower guidance focused on the technical details of single programs. It is important for the SEA staff to clarify and communicate potential effective uses of funds before focusing on coordinating the funds. Local education officials need layered support that *first* highlights effective practices; *then* identifies the personnel, goods, and services needed to implement them; and *then* distinguishes the varied funding sources available to support these costs. SEA officials can deliver this layered support through clear communications and direct technical assistance. (The Resources section of this brief provides references for some specific examples of activity-focused guidance.)

Table 1. Example of How an LEA Could Use Various Federal Funding Sources to Address Chronic Absenteeism

Federal Funding Source	Use of Federal Funds
Title I Part A	<ul style="list-style-type: none"> • Counseling, school-based mental health programs, specialized instructional support services, mentoring services • Implementation of a schoolwide tiered model to prevent and address behavior concerns • Other academic and non-academic supports that can improve student engagement and connectedness, including teacher professional development and family engagement
Title II Part A	<ul style="list-style-type: none"> • Professional development activities that deliver in-service training in techniques needed to help educators understand when and how to refer students affected by trauma or at risk of mental illness • Forming partnerships between school-based mental health programs and public or private mental health organizations; addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism • Using data effectively (which could include how to use data to identify students at risk of chronic absenteeism) and identifying early and appropriate interventions to help struggling students
Title IV Part A	<ul style="list-style-type: none"> • College and career guidance and career awareness programs • Programs that use music and art to support student success, engagement, and problem solving • Supporting the participation of low-income students in nonprofit competitions related to STEM, environmental education • School-based mental health programs • Programs that provide mentoring and school counseling to all students • Programs that establish learning environments and enhance students' effective learning skills • Bullying and harassment prevention
IDEA Part B	<ul style="list-style-type: none"> • School climate initiatives to address the needs of students with disabilities • Warning systems and progress monitoring for students with disabilities • Academic and behavioral supports for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services (CEIS) set-aside

Box 1. Understanding the Role of “Supplement Not Supplant”

Supplement not supplant (SNS) provisions require districts to use federal funds to “add to,” not replace, state and local funding for education. Under ESSA, the method the LEA uses to allocate state and local funds to each Title I school must ensure the Title I school receives all of the state and local funds it would otherwise have received if it did *not* receive Title I funds — in short, the LEA cannot reduce the total amount of state and local funding going to a Title I school because that school receives Title I funds. At the same time, there is no longer a requirement for local officials to document that *individual* Title I costs or services are supplemental, which should make it easier for LEAs to coordinate their Title I monies with other funding sources.

application promote spending aligned to needs, or does it limit local spending options in some inadvertent way(s)?

SEA staff should also review the state’s monitoring process to ensure that it promotes financial transparency and emphasizes effective, strategic spending over technical compliance. Finally, local paperwork burdens can be clarified and/or minimized thanks to recent federal guidelines around time and effort² and “supplement not supplant” (Box 1), but these flexibilities may not yet be very well understood in the field and might be better communicated by SEAs.

2. Coordinate SEA planning efforts. State leaders can shape local programs and spending in several ways, but SEAs need to be strategic and coordinated in their efforts — collaborating across the organization to define what should be promoted and to which local audiences. *SEA staff need to collaborate* in reviewing and discussing best practices and allowable uses of funds. Further, coordinated grants management requires common understandings, collaboration, and planning between SEA program and fiscal staff, including monitors and auditors. ESSA specifically cross-references programs to encourage this type of coordinated planning.

3. Refine and streamline the mechanics of applying for and implementing grants. Initiating spending changes is difficult. States can ease the burden by refining mechanics to clarify and align spending options. For example, the SEA holds substantial authority over the design of the LEA consolidated application, meaning SEA staff can ask strategic questions in the application review: Does the consolidated

² Regarding time and effort reporting, see, for example, the *Letter to Chief State School Officers on Granting Administrative Flexibility for Better Measures of Success*: <https://ed.gov/policy/fund/guid/qposbul/time-and-effort-reporting.html>.

Resources

Junge, M., & Krvaric, S. (2017). *Developing effective guidance: A handbook for state educational agencies*. Washington, DC: Council of Chief State School Officers. Accessible online at <http://www.ccsso.org/Documents/2017/ESSA/CCSSODevelopingEffectiveGuidanceHandbook.pdf>

Junge, M., & Krvaric, S. (2016). *Decision guide for ESSA implementation: State considerations for effective grant programs*. Washington, DC: Council of Chief State School Officers. Accessible online at <http://www.ccsso.org/Documents/2016/ESSA/CCSSODecisionGuideForESSAImplementation.pdf>

Junge, M., & Krvaric, S. (2016). *Maximizing ESSA formula funds for students: State readiness self-assessment*. Washington, DC: Council of Chief State School Officers. Accessible online at <http://www.ccsso.org/Documents/2016/ESSA/MaximizingESSAFormulaFundsforStudentsApril2016.pdf>

State Examples of Activity-Focused Guidance

Louisiana Department of Education. (2016). *Louisiana's district planning guide for 2016-2017*. Baton Rouge, LA. Accessible online at <http://www.louisianabelieves.com/docs/default-source/teacher-toolbox-resources/district-planning-guide.pdf>

Mississippi Department of Education. (2016). *Supporting early literacy for students with disabilities with IDEA, Part B: Fiscal guidance*. Jackson, MS: Office of Special Education. Accessible online at http://www.mde.k12.ms.us/docs/special-education-library/idea-supporting-early-literacy-fiscal-guidance-4-15-16_20160505125408_154638.pdf

Tennessee Department of Education. (2014). *Response to instruction and intervention: Guidance for federal funds*. Nashville, TN: Office of Consolidated Planning and Monitoring. Accessible online at <http://tennesseegms.blob.core.windows.net/publicgmsdocuments/66e43acb-8894-4544-bbba-7b3df90ea431.pdf>

Federal Examples of Activity-Focused Guidance

U.S. Department of Education. (January 2017). *Examples of leveraging ESEA, IDEA, and Perkins funds for STEM education*. Washington, DC. Accessible online at <https://innovation.ed.gov/files/2017/01/dcl1-18-17.pdf>

U.S. Department of Education. (July 2016). *Examples of leveraging ESEA, IDEA, and Perkins funds for humanities education for school year 2016-2017*. Washington, DC. Accessible online at <https://www2.ed.gov/policy/elsec/guid/secletter/160713.html>

U.S. Department of Education. (November 2014). *Examples of leveraging ESEA and IDEA funds for digital teaching and learning*. Washington, DC. Accessible online at <http://tech.ed.gov/wp-content/uploads/2014/11/Tech-Federal-Funds-Final-V2.pdf>

U.S. Department of Education. (June 2014). *Federal programs and support for school counselors*. Washington, DC. Accessible online at <http://www2.ed.gov/policy/elsec/quid/secletter/140630.html>



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This brief was supported by the Center on School Turnaround through funding from the U.S. Department of Education, PR/Award Number S283B120015.

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Suggested citation: Center on School Turnaround at WestEd. (2017). *Thought leadership forum brief: Braiding federal funds under ESSA*. San Francisco, CA: WestEd.

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