



## Concurrent Session: Doing More with Less: Strategic Blending and Braiding of IDEA Funds Amid Fiscal Shifts

**Amber McCollum:** Okay, well, thank you guys for being here. My name is Amber McCollum, and I am a senior TA provider here at AIR, and I'm so pleased to be in front of you today and talk to you about some flexibility and funding. So, this session is about blending and braiding and so being able to do more with less.

And we know that times are uncertain, our money is so important, and it is so vital that we have the progress that we need with students with disabilities and so being able to maximize the funding and be as flexible as possible, I think is the way that we're going, and something that will truly help all states and LEAs and school districts.

So, I just want to go into that a little bit. I do have some experience in this. Before I came to AIR, I worked at a state agency, and at the state agency, I actually developed the program to where, which we started consolidating special education funds. And there was a real mind shift behind that. And so, I just want to talk about that a little bit with you guys.

And offer some resources and some tips and just kind of out-of-the-box thinking, because our resources are the most important thing. And we're all tasked with making sure that this next generation of students receives everything they need, both in life and educationally. And so, to be able to maximize those dollars is super important.

Now, one thing I do want to say is that I'm a nerd, right? Like, I talk about finance, I talk about fiscal stuff, I talk about money. This tends to be the things that most people don't want to talk about. But I will try to make it as easy to digest as possible and hopefully inspire you just a little bit to think outside the box and to take action on how you can truly be flexible with IDEA funds, especially with all the shifts that are coming.

So, thank you for being here. I'm so grateful for you, and if nobody else has told you this today, you're doing a great job. Just showing up, just getting here, getting to this. You're rock stars. So, thank you so much for that.

So, as I said in the introduction, we are doing more with less. And hopefully, that'll make us have more later.

So... How can we strategically use IDEA funds to implement essential elements necessary for success?



So, success is the goal. Success is the goal for kids, and we all have that responsibility. And so, regardless of where you are, whether you're in a school, a school district, a state, or a national center, we collectively, as a community, have this responsibility. And one of the main components of that is being able to be fiscally responsible and steward our funds as best as possible. And the PROGRESS Center has identified essential elements that will help that, and that support high-quality instructional programming for students with disabilities.

So, you see the graphic here on the screen. And so, that's the goal. We want to incorporate everything that encompasses the whole child. Staff collaboration, educator support, individual instruction and support, student belonging, and then effective general curriculum with supports. We know that students with disabilities are also general education students first, and so those types of supports are needed by all students.

So I want to start with some myths. And these are myths that you may believe, or you may not have even heard, or you may say, Amber, I don't even really understand them or know what you're talking about. But that's okay. I want to start with the myths, and then we're going to break them down throughout the presentation, so hopefully you understand them a little bit more.

The first one is about consolidation of funds. So just to get a poll in the room, and I know I only see a few of you, but, if there's any way you can do a reaction, if you're not showing your face, that's okay, but who... how many of you know what consolidation of funds is?

Right, so... Okay, okay, we're seeing it. Everybody with their thumbs up, you could basically teach this session then, correct?

Yeah, that's what I thought. Awesome, awesome. So, students with disabilities will not have access to critical IEP services if IDEA funds are consolidated. That's a pervasive belief. And the reason why it's a pervasive belief it's actually kind of sweet. Like, everybody wants to do the right thing. You want to do the right thing; I want to do the right thing. I tend to believe that most people go into education to do the right thing.

And so, in order to do the right thing, we've been hammered over our heads about compliance. And compliance is doing the right thing. So, when you start thinking about things like consolidation of funds, you think students aren't going to get the services, we're out of compliance, something's going to break, I just... I don't want to mess with it. I want to follow the rules, I want to do exactly what we set out to do, and so I don't want to do anything out of the ordinary. I just want to fly under the radar. My job's so hard, I don't want to think about it, okay? But I want to challenge that... that myth because you can work smarter and not harder by consolidation of funds, and every single student, including students with disabilities, will still have access to critical IEP services, even if funds are consolidated. I'm going to show you how that happens.



SEAs cannot monitor school-wide programs effectively. That is a common belief with states. Now, LEAs and school districts, they know what their state does, so they know that the states are monitoring, and they're coming in, and they probably think, yeah, you can... it's your job, you can do it.

I just want to say that there... there is statute that says... that talks about school-wide programs, and that says that states should break down barriers for LEAs to allow a school-wide program to have as much flexibility as possible.

So, states absolutely can monitor school-wide programs effectively. I've been in a state that does it. I know states that do it. So, that's a myth as well.

It is difficult to consolidate IDEA funds because they are not allocated at the school level. And that's just not true. It is true that IDEA funds are allocated at the LEA level. However, IDEA funds can certainly be pushed into the school level, and there's a real benefit to doing that. And one of the benefits that we'll get into later, but I'll touch on real quick right now. Is that it means that the principal has control of the needs of their schools. And whenever we can empower school leaders to have the control of the funds and the control of the programs and be able to dictate how all of that works based on all students' needs, not just students with disabilities, then you can really leverage those resources and use them more effectively.

Absolutely, IDEA funds can go down to the school level, and they can be used effectively if they do.

School-wide programs will have MOE concerns if IDEA funds are consolidated. Now, MOE stands for Maintenance of Effort. It is a requirement, as far as IDEA... in the IDEA. And I will say that this is a myth, but it is something that you have to consider, because the federal government considers this a lot. You have to maintain your maintenance of effort, and this isn't a presentation about maintenance of effort, but you do have to maintain your effort, regardless of whether you consolidate funds or blend and braid funds. Maintenance of effort is still a requirement, and it will always be a requirement. And unless an act of Congress, which does take an act of Congress, reauthorizes IDEA, then it will always be something that you have to consider. And you won't have MOE concerns if you consider them up front and plan for them up front. So those are some of the myths that I just wanted to spell before we even begin.

So, just to level set, what does braiding and blending mean?

Braiding is actually used more commonly. So, braiding is... is pretty simple. It's just coordinating funds for one purpose. It basically is an individual funding stream that maintains its identity. What I mean by that is if it's a Title I funding stream, it maintains Title I. All of the things required for Title I is still there when you're braiding funds. And we'll talk about how to braid funds in a second, but basically what you need to know is that it doesn't lose its identity. For IDEA, it's the same. So, all the requirements that you have from federal IDEA funds, if you braid funds they don't lose their identity, all of those requirements are still active.



Blending funds are a little... a little different. So, blending funds is the most flexibility you can have, and it's consolidating all of the funds into one funding stream. So basically, you have one funding stream, and they lose their identity. When states allow LEAs to consolidate funds at the school level, those funds actually take on the identity of state funding.

And so, I... I can't wait to share how some of that plays out.

But let's talk about braiding first. So, braiding is basically coordinating multiple funding streams to support a common initiative, but each stream is kept separate. That's what we mean by saying they don't lose their identity. All funds keep their identity, and they keep the requirements. So, everything that's required in all of these funds, they're still required.

How this may look in practice is, let's say that you are... let's say it's district level, it's not even school level, it's district level, and there is a software that will help multiple streams of... of students. Like, students with disabilities, it could help migrant students, it could help English language learners, and there's a software that, let's just say it's about language and literacy. Your ELL funds may not go far enough to pay for the entire district to have that software. But, if... you can see a relevant benefit for every single stream of funding, so for every single grant. So, for your Title I funds, Title II funds, your IDEA funds, your ELL funds, any of those funding streams. If there's a benefit, then you can pool those funds together and purchase the software.

You still have to keep records of reporting, you have to keep records of, how... it's called allocability, so how you determined that each grant would pay a portion of that software.

So, a lot of ways people do it is by percentages of students, right? So, if you have 6% students with disabilities in your district, then you can use 6% of your IDEA funds to pay for that. If... And the same goes for all funding streams. And then maybe you can even add state funds into it. So basically, it means that for the purpose of the grant, you still meet the purpose of the grant, but you're only offering so much to that software, you're only contributing so much as to the relative benefit of the number of students that you have that would benefit.

And I feel like I see a question in the chat.

Very large school districts do not give individual schools the opportunity to manage their own funding. Independent charter schools get to manage their own funding, which makes spending so much more effective for special education. I see that a lot with charter schools. And I do see that a lot with really large schools as well, Wendy. Large districts, but I do think it's because they don't understand it, and I think they haven't tried. So, there's certainly conversations that can be had with large school districts to where the funding can go to the individual school, but it's... it requires a lot of planning and a lot of collaboration.



Perry, I'm not necessarily sure I understand your question. Is it what they frequently call double-dipping? I may have said something earlier. So, if you want to clarify, I'll come back to that question.

So blending is the most flexible that we can have. It's used to combine multiple funding streams into one pool to support a common goal, and all of the funding streams lose their identity. The school-wide program allows the most flexibility for blending.

A school-wide pro... there's something called the Compliance Supplement. It comes out every year by the federal government. And they publish it. They haven't published it for this federal fiscal year, because the federal fiscal year starts on October 1st. And the compliance supplement is something that auditors review before they come and audit your school districts. Inside of that compliance supplement. I have not seen one that does not allow for the auditing of a school-wide program.

School-wide programs are a Title I thing. And I'm not going to get too much into the weeds of what that is. But it... there is something in the compliance supplement that says auditors need to check to see if IDEA funds have been used to support a school-wide program. And just by the fact that it says that shows that States need to be thinking about how to break down barriers for districts so that they can fully support their school-wide programs.

And that starts with a needs assessment, and then it starts... and after you do your needs assessment, what funding streams can support these goals that we've developed in this school-wide program?

So let's go a little bit further into that. So why would you even consider this? Because basically, you want to fund your plan better, rather than plan your funds. And most of the time, we see on these grant applications states and LEAs are planning for their funds. Like, okay, we know we're going to get \$5 million here, we have this much staff, we did it this way last year, we know we still need this number of staff, so we're going to continue just to do the same thing every year. Maybe there's a little bit of data review, maybe not.

They... there's certainly TA around it, there's certainly forums and discussions. Even with your grant application for IDEA, you have to post it for 60 days, and we don't even see a lot of public comment on that.

Even though it's posted for 60 days, and 30 days out of those 60 days are supposed to be open for public comment. This is a requirement that every state has, yet we just don't see many people in the public actually commenting about how these funds are used. Therefore, it's just the same... the same thing happening every year.

And so, in order to flip that on its head. You guys need to be thinking about how to fund the plan that you have. Because if you plan first, if you do your needs assessment first, then you can truly know what the students need, and then you can dictate where the funds are going based on those student needs.



That's essentially what blending and braiding does, and that's essentially what a school-wide program is. So... Another reason you should consider it is because you want to optimize the ability to serve students with complex needs by providing access to streamlined services rather than multiple separate programs. And we've seen that a lot, where it's like, let's throw everything but the kitchen sink. Okay, they need this literacy program, they need this math program, they need this language program, so we're just going to spend all of our dollars funding all these programs.

And there's... there's... we see a lack of communication just amongst other federal programs, so when I talk to special education directors and special education teams. I see that they're trying to do the very best they can to purchase the things that their students need, but yet, Title I may have also purchased the same thing for their students. But there's no communication to know that, and so there's never a shared cost there.

And if there's a holistic approach to all students in a school district, or all students in a school, then you can start having the conversations about where are these funds going? Like, what software's being purchased over here? What program's being purchased over here? What resources do we bring in, in terms of...of educational training. Like, can that be funded to all teachers versus just our special education teachers get this training, our other teachers get this training.

Really, if you can have a comprehensive approach, then you can meet the needs in a much cheaper way, but really way more effectively. So...Also, you want to consider blending and braiding to differentiate fiscal and human resources based on need, and not just what's eligible for the program. So we know there's a lot of things allowable, but your mindset should constantly be on what is needed, not what's allowable.

And a lot of times, you... a lot of these funds are for staff, and you do need staff. But are the staff's FTE going towards the needs of the students based on your needs assessment, or are they fulfilling duties that you need to support the grant? And where do those overlap with needs that you can support other grants with? Those are the types of questions that I want you to consider as we're moving through this.

Another reason is to reduce arbitrary routines of fractioning staff FTE based on funding streams, rather than maximizing the FTEs to support to students. And that's what I was just talking about. Like, a teacher that has a specific skill set, that is an expert in a certain area should not be capped on only working with certain students. That teacher or that expert should be working with as many students as they need to work with. And the only way to do that is to break down these silos of streaming, of funding streams, so that you can truly support what the expertise is, and leverage it to help all the needs, not just specific needs, because this is what this type of funds are paying for, right?

And then we want to desperately minimize the duplication of human and fiscal resources. If you do an audit in your schools or in your states, you'll probably see that there's a lot of overlap in what all of the federal programs purchase. Because federal programs lean into evidence base soft...evidence-based



practices. And so, as they're leaning into that, they're purchasing things that are needed, are relevant, are necessary, are reasonable, but we see that several times this particular thing is purchased. And it's because there's a belief that, well, I'm purchasing this for the Title I kids, or I'm purchasing this for students with disabilities. And what if you could purchase it for everybody, with one funding stream? That would potentially be a great reason to consider braiding or blending your funds.

So, which funds may be braided and blended? So, for braiding, unrestricted state and local. So you can put any amount of state and local funds into those, they're, they're...some restricted state funds may go in, so the reason why I say that is because some... there are some state categorical funds that aren't necessarily, like, funding for overarching students with disabilities, or funding for education, but they're specific categorical funds, and so they may or may not be able to be braided or blended. It's based on the state statute and what the purpose of those funds are. Those can be consolidated if the categorical grants allow for that. And then with federal funds, which can be braided, you're looking at your ESEA Titles I, Title II, Title III, Title IV, and your IDEA, including IDEA CEIS. So, IDEA stands for Individuals with Disabilities Education Act, and ESEA stands for Elementary and Secondary Education Act. CEIS stands for Coordinated Early Intervening Services. ESEA is often a synonym for ESSA, so that's what we're talking about here.

And then on blending funds, this is where you have your most flexibility. This is where consolidation comes in, this is where you can go to the school level. So, you can... you definitely have to have at least a dollar of state funds in. So, if you're going to consolidate funds, you have to have some state funds in there.

Same rules apply for some restricted state funds and unrestricted state and local funds. You can add state and local funds at your will, you MUST have state funds. And then the federal funds that can be consolidated are going to be your Titles 1, 2, 3, 4, IDEA. Sometimes, there are more... as...states talk to their project officers with more funding streams, there may be more funding streams that can be consolidated, because there's a lot of those considerations that are coming up, but I don't want to put hypotheticals on this slide. So, other states do consolidate more funds than this, and that's because they've got explicit permission from their project officers, but because it hasn't been spread nationwide that that's allowable, I wouldn't want to include that here.

So, let's talk about the most flexibility. Let's talk about blending. And here is the statute, 34CFR. 34 stands for your Education Code of Regulations. And then CFR stands for Code of Federal Regulations. It's 300.206A, and this is your school-wide programs under Title I of ESEA. So the school-wide program, like I said, is a Title I thing and it says, an LEA may use funds received under Part B, which is IDEA, of the Act for any fiscal year to carry out a school-wide program under Section 114 of the ESEA.

So, on its face, is consolidation of IDEA funds allowable? Yes, it is allowable. And this is the proof that it's allowable.

So, here's some things that you want to consider as you're thinking about this.

What services are truly needed? Because I'm not necessarily an advocate for you taking all of your IDEA funds and consolidating all of them. The reason why is because we know IDEA funds are individualized to the student, so students with high needs may move in and out of these school districts. And because of that, I would definitely suggest leaving some of your IDEA funds, especially if you're a small school district that doesn't have access to additional state fundings, or additional funding streams, or even local funds, then definitely you wouldn't want to consolidate all of your IDEA funds. So, you... the main question to ask is what our services need... needed, and that will help you determine how... how much funding you should consolidate.

Is the child experiencing homelessness? Does the child have a disability? Does the child attend a Title I school? Is the child an English learner? Is the child migratory? Is the child enrolled in a rural school? The interesting thing about this graphic is that this could be one child. And that's what a lot of people don't consider. Like, one child could have all of these needs. But let's take that one-child approach and think about their experience in a school district.

If they are a child who's in a rural school, and migrant, and homeless, and... and... have a disability and they enter into your school and everybody with the best intentions hits them with every single... every single thing that they can offer them. All the programs. And each one of these funding streams has a program specifically tailored for this student.

How difficult do you think that student will have succeeding in the school. If they have access and are required to do all of the programs that all of these funding streams have made for.

Do you think it would be difficult? I do. I... I struggle multitasking.

But if I had... if I was one student who all of... had all of these things, Against me? And I use that loosely, because I see a lot of resilient students who overcome this, and I'm not ascribing judgment on any student, but...but that's hard to overcome. It's hard to walk into a school district and say, let's hit me with a Title I program. Oh, I've got reading, and I've got this, and I've got this, and I've got this.

I think it would be better to look at that child...Exactly, Amy. Exactly. I think that it would be better to look at that child and say, what plan does this child need, and where can we leverage our resources to help this child? And other child... children just like this child. The only way you can do that is to have a comprehensive approach to how you spend your funds. And the only way to do that is to consolidate the funds into one funding stream so that you can have a pot of money where you can take all of the needs and use that, those funds to fund the needs that you identified in your plan.

That's the way to do it. There are other ways. They're harder. And more costly, honestly.

But before you begin, braiding and blending. You do have to keep in mind that federal grants have fiscal requirements. Right. Some of the requirements are waived with some of these things, and some are not.



SEA and LEA staff must understand the requirements. You have to understand the requirements of all of the funding stream before you ever do this. Because you need to make sure you're still in compliance. We do want you to be in compliance. We want everybody to do the right thing. We just want you to do the right thing in a more flexible way, and that's less of a headache for you.

Also, effective fiscal procedures are essential for successful coordination and consolidation of funds. And I would go further to say, we all know we need procedures. That's...That's the lowest level of what you need. But I would go further to say that really you need to break down silos in your states and in your schools. Your federal programs and your general education programs and your state programs should be so well-versed in the needs of all of these students, that they should be communicating on a regular basis. And we just do not see that communication taking place broadly.

I see some schools and states doing it really well. But I also think it should be modeled from the state, right? The state needs to model that type of communication.

Before you start this, you definitely want to start small. So, states and LEAs that have been successful did not jump in at once. Sometimes they just jumped in with state funds and Title I and IDEA. And that's it. And just a small portion of those.

And the example on the screen is that an LEA blends Title I and IDEA CEIS funds to hire interventionists for students at risk of being referred to special education, fund professional development for general education's teacher on behavior supports and culturally responsive practices and run family engagement sessions.

If you can just take those two funding streams and combine them to do these things, do you see how much more effective it is to use two funding streams to basically kill two birds with one stone? That's the example here.

And then, of course, the expected outcome was to reduce misidentification and build capacity.

So, if we just talk about school-wide programs, a Title I school-wide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school to improve the achievement of the lowest achieving students. And sometimes the lowest achieving students are also students with disabilities, not just Title I students.

When a school consolidates funds in a school-wide program, those funds lose their individual identity, and the school may use the funds to support any activity of the school-wide program without regard to which program contributed the specific funds used for the particular activity.

And here's what I was talking about. Each SEA must...that is a must in statute...each SEA must ensure that it will modify or eliminate State, fiscal, and accounting barriers so that these funds can be more easily consolidated. And a lot of people don't read that, or they don't think that that is a barrier. And



some of the reasons is because they don't know. Other reasons is because LEAs might not be raising their hands and saying, hey, I want to do this. Please eliminate these barriers.

Sometimes states don't feel like they have the capacity, or the communication, or everybody's in their lane trying to do the best they can. I've worked in state government at all levels, and...and your jobs are extremely difficult. And so I understand you may not know exactly what to do, and so just to do the same thing you've been doing seems like the right and reasonable and more effective thing to do, because it's something that you know, and you're familiar with it.

This non-regulatory guidance, the ESSA school-wide guidance here, it's linked in this PowerPoint. I want you to be able to use this as a resource. It does talk more deeply about school-wide programs, and so it can provide a little bit more clarity, and that came out in 2016.

So this is about the mind shift that we're talking about. You don't make progress by standing on the sidelines, whimpering, and complaining. You make progress by implementing ideas. And... That's the whole thing about what the PROGRESS Center stands for, right? We have ideas, and a lot of times, some people have ideas, and they want to do the right thing, and then...everybody says... there's so many no's, and there's so many... I don't think this would work, and I don't think this would work, and let's go ask this other person, and no, we do it this way. But if you came at a conversation to say, we want to make progress by implementing the ideas. We want to throw everything on the table, even if it's a bad idea. Let's throw it on the table and see what works.

And I think that's the way you should approach blending and braiding. Like, throw all the ideas at the table. What if... what if you had a billion dollars?

If I could write you a check for a billion dollars right now, how much more effective could you be with the students? You could be, right? And essentially, consolidating funds gives you more funding. You don't get a bigger check, but the dollars have more value, because they go further.

And so, as you're thinking about this, I want you to think about the mind shift that it takes for leaders to have and teachers, and principals, and special ed directors, and everybody else involved. You have to be willing. So you think outside the box. Right.

**Amy Peterson:** Amber, before you jump forward, Noreen had a good question in the chat about, the school-wide programming and whether or not it applied only to Title I schools or not.

**Amber McCollum** So, a school-wide program pertains only to Title I schools. So the most flexibility will pertain only to Title I schools. But consolidation of funds and blending and braiding overall, it does not pertain just to Title I.



So, you can braid funds without being a school-wide program. And that's a great question, Noreen. So, some school districts have, like, 90% Title I schools, but then 10% not Title I schools, so they'll consolidate all of their 90%, but what that ends up doing is freeing up some funds for the other 10% of schools that are not school-wide schools. So even if you only have a few school-wide schools in your district, it can still maximize the funding for the entire district.

That's a great question.

So, state educational agencies must prioritize and model the partnerships and communications across the agency with federal programs and other divisions. So, in order for this to work.

All of your federal programs at the state level need to communicate and audit their systems and model a streamlined process together. That may mean monitoring together, that may mean developing a needs assessment together, that may mean, having a risk assessment that corresponds to all federal programs, but what it... it could be joint TA sessions. It could be a federal programs conference instead of a special education conference. But it is going to start at the state level, because you have to have state support in order to do this at the individual school level.

And so, what we suggest is that you, you do model, the states, the states model what it should look like first. And that might even be blending a little bit of their funds to offer TA to school districts, right?

Let me check the chat real quick.

It's been so helpful. What are some other ways to build expertise and funding? I'm a Special Education Director for Public Charter School Network across multiple states.

There's lots of... so there's a lot of resources out there that can build expertise and funding. And, Lindsay, I'm just so glad you said that, because when I talk to special education directors I hear a lot of special education directors so focused on all the things that they should be focused with, right? Like, dispute resolution and programmatic things and education and the goal setting and all of those for the program side of it and making sure they're in the right placement, and they have their IEPs annually, and all of those things. And so when we talk about funding for special education, I see it on the back burner a little bit. And so, just the fact that you asked that question shows... shows that, number one, you care, and I appreciate that question a lot.

But it also shows that special education directors don't have access to a lot of expertise and funding. We certainly have resources here, with the PROGRESS Center and an AIR that we can help you with, and there's a lot of other resources that we can share after this presentation, but that's a good question, and I want to do the most that I can do to make sure that every special education director is fully equipped to make funding decisions, for their programs. So, thank you for asking that.



Local education agencies must be willing to have cross-divisional buy-in and support. So after the states model this, the LEAs have to model the communication as well from the school district.

And generally, principals and senior leaders, like superintendents, they are the first willing to break down the barriers, because they see the need for it, and because they... they are there to think outside the box. Where we see the breakdown a lot of times in school districts are going to be your local directors of finance, and there's a good reason for that. And program directors generally need support and guidance to understand how consolidation is beneficial.

Program directors are so used to thinking about the program in their silo and advocating for their program, and they do a great job of that. Special education directors do the best job of anybody to shouting at the rooftops on what their students need.

And because of that, because they do such a good job at that, and you all, if you are a special education director, do such a good job of that, there's almost some blinders here as to why you would want to give away your special education funds, because that's the mindset they have. It's like, I don't want to give away these funds, I barely have enough funds to operate now. And so. really leaning into some technical assistance with the finance directors and with directors over these grants, that's where we see the biggest, bang for our buck, right? And the reason why local finance directors are so hesitant is because, you know, they have to be in charge of the funds.

And if you don't, I will say this, full stop, if you don't have an accurate reporting system, this is not a good fit for you. You have to get your accounting and reporting down, because even though the funds lose the flexibility, the reporting requirements are still there.

And so, the burden of this honestly does fall on the directors of finance. However, if the state has a robust system, and the state can kind of have that net that'll catch the finance directors and can walk alongside of them, then the finance directors won't have a difficult time. It's up to the state to break those barriers, both with recording and reporting, recording

It might be even with function and object codes that are being used. We had to change our entire function and object system in order to allow for consolidation of funds, but then that broke down the barriers easily, and it got finance directors on board. Once school districts are on board. I've only seen one school district go back, and that's because they... unfortunately, that school district had fraud in their district, and so they shouldn't have been consolidating in the first place. But anybody else who has consolidated funds, they have not gone back because they've seen the benefit, not only just from ease of use, but also they've seen the data and the trends that the students are having as far as educational outcomes, which is what we want.

So, here's how it works. Here's the logistics. An SEA allocates funding. LEAs would complete a needs assessment. You have to have a needs assessment for your school-wide program. LEAs then determine



school-level allocations, so LEAs determine what allocations go to the schools. LEAs determined that consolidating schools. Are all school-wide schools consolidating? Maybe, maybe not.

But it does have to be a school-wide program school. The school performance has to be part of the consideration, because you want the school and the principal to be committed, you want that staff at that school to be committed to overseeing these funds and really directing the way they go in a comprehensive and efficient and effective way.

And then, ... LEAs also determine any special grants that may go into consolidating schools.

Program considerations for consolidation is school improvement. So, are you on a school improvement plan? Like, some of the things that you need to consider is if there are so many problems that a school has or a district has on a risk assessment that they need to overcome first, they may not be a good candidate for consolidating. So, when I say consolidating funds, I am a proponent of it, but I'm a proponent of doing it at the right time with the right schools.

Other considerations could be Title I, Part C funds, Title II, Part A, IDA 611, and then any other funds that may or may not be consolidated. And then, other considerations are your state and local contributions. In order for a school-wide program to consolidate funds, you have to at least have \$1 of state funding. I would recommend more dollars than that, because you're going to get a lot of pushback if you only put \$1 in, and then all of these federal funds lose their identity.

And so by me saying, lose their identity, what I mean is the...these funds, these federal funds, become state funds. They act like state funds, which means, and I'm going to give the worst example possible, because I don't think you should use your funds this way, but you can actually pay for landscaping with IDEA funds. Because they're state funds. Now, should you pay... should you do that? No, you should not. But that's what I mean by saying they lose their identity. Like, you literally have the flexibility to direct the funds however the students need them to be directed.

Other considerations are staffing needs, professional development, software, and flexibility. I want to lean into staffing needs a little bit. If a student has a one-on-one pair on an IEP, the student still has to have a one-on-one para based on their IEP. Like, that's still going to be a funding need. Students are still going to get their services on their IEPs. So, when you're thinking about that, you wouldn't want to take that para and then say, well, it's a one-on-one for this student, but they can be used all over this, because we have so much flexibility.

You don't have flexibility on not providing the needs in the IEP. You have to do that. But you have flexibility in a lot of other ways.

So, why should you consolidate funds? Efficiency, effectiveness, equity—meaning, all students receive exactly what they need to receive that's tailored to them, and you can make a plan for that. The focus is instructional at that point. You can literally fund the plan that you need.



Flexibility, there's a lot more collaboration, there's a lot more innovation. Families love this. There's a positive impact for families, because they don't have to advocate so much for their individual child, because their individual child's getting everything that every other child is getting and needs, because the funds are going towards all students.

Why you should not consolidate would be federal funds are heavily focused on central office staff serving multiple schools, so if a lot of your federal funds go to your central office staff, then you may not have the funding available. If you don't have strong internal controls, meaning there's already problems with conflicts of interest, or segregation of duties, or things like that in your, accounting system, then if your accounting system's not good, you probably should not...should not consolidate.

Staff turnover is huge. This needs to be rolled out multiple years, and in order to be 100% effective it... you're going to grow year after year. And so, school districts or schools with a lot of staff turnover, it might not be the best to start.

And then, new processes and procedures must be developed, and if you are starting with new processes, like you... a brand new charter, and you just started, you may need to get your feet wet first, and understand all of the things that you need to understand just as a brand new charter than trying to consolidate right at first. So, those would be some reasons.

So, for your LEA impact, the focus has shifted, funds are now closer to the students, there's a less administrative burden, and I'm going to talk about what some of those flexibilities are. It fosters collaboration, like we talked about. It promotes innovation, decreases regulation.

Raise your hand. Or give a thumbs up or a reaction if you want to see less restrictions on your day-to-day life. Yeah, we all do, right? This does that, for sure.

So... if you are going to have consolidation of funds, you have to have support. When you're first starting, SEAs and LEAs should have at a minimum, a quarterly check-in.

The drawdowns should be reviewed, because these drawdowns are going to look very different. When they're consolidated, you're drawing down from several different funding streams all at once, and so you're going to want to review those drawdowns just to make sure things are going well at the very beginning. And I would suggest that you review drawdowns all the way through.

And then, of course, states and LEAs are going to need technical assistance support. States are going to need to support the LEAs. LEAs are definitely going to need to support the schools.

So, when you're... when you're... when monitoring occurs, and monitoring should occur, and this is one of the myths, people think, well, I can't monitor them because they have so much flexibility. The monitors... the monitoring looks different. It's not the same. So, when you're monitoring IDEA funds in



a school-wide consolidated program, you're no longer monitoring a one-to-one dollar, and this is where some of the regulations decrease. You're monitoring the intent and purpose.

And the intent and purpose—and every school-wide program should be able to craft their intent and purpose. So, you're monitoring the intent and purpose, and what that means is, you're still supporting the purpose of the grant, and the intent and purpose is to still serve students with disabilities. So, they're going to be talking about how they serve students with disabilities.

What you would not want to see in a consolidated school is a lot of changing of IEPs. Like, oh, we're going to change IEPs because we don't want to do this nurse, we don't want to do this one-on-one para, because that's not going to fit in our school-wide program. No, no, no, you still have to support the purpose of the grant, and the intent is still to follow the IEPs just like they are written.

And then, of course, we talked about drawdown and statute requirements. And I want to have time for questions, so I'm going to zoom through the next little bit, because there's a point I want to hammer home, and then open it up for questions.

So, some of the examples of monitoring, and this is where your flexibility really comes in, you're still required to have equitable services. So, proportionate share, things like that, it's still going to be required. You still have to have cash management procedures, that's a uniform grants guidance thing. You still have to have drawdown reporting. All of these funds still have to be reported to their respective offices.

You're still going to have your single auditors come in and audit you. You still have to have your maintenance of effort documentation and your excess cost calculation. That's what's required.

What's no longer required if you consolidate funds is time and effort. So those annual certifications or semi-annual certifications, you no longer have to do that. Because these funds lose their identity and they are state funds, and state funds do not require it, so unless there is a state requirement, you no longer have to do that.

You no longer have to keep inventory, unless it's a state requirement. I mean, you do need to be a steward of the inventory you have, but it removes it from the federal requirement part of monitoring.

Procurement levels. So, all of those things, your bids, all of the RFPs, the things you put out. You still have to follow your state and local requirements, but all of those thresholds are out the window. You can truly go find the quality programs that you need to find for your school.

And then the travel policy. It's out the window unless it's a state or local requirement.

Some of the additional requirements that must happen if you have a consolidated school is the amount of funds consolidated may not exceed the amount received by the LEA under Part B. So basically, you



can't consolidate more funds than you receive, and you must comply with all of the other requirements of Part B for IDEA.

And here are the big picture questions that I want to ask you, and then I'm going to open the door up for you to have questions. And I want to say this really quickly before I do that.

Where we've seen the most traction have been with principals. I can put you in touch with principals who have loved this, who have said, I have seen a major shift. When we... when I was a part of Georgia and we started it, we started it a few years before COVID happened, and so COVID kind of messed up the data a little bit, but we were already seeing trends move in the positive direction because the schools were empowered, and we saw an elevation in conversations.

So we not only saw the data trends moving in the right direction, but we saw these conversations where people were thinking about what do students need. And... and funding didn't even come up. It wasn't like, how are we going to pay for it? I know they need this, but we can't afford this. That wasn't part of the equation. And that's because principals had a bigger bucket to work with. So they could truly say, here's our bucket, what do students need? What do all students need in our school? What do our 5th graders need? What do our third graders need? And then they could buy the things that they need, or hire the professionals that they need.

They no longer had to... when we talked about time and effort, if a paraprofessional was paid traditionally from a Title I place, unless they're a one-on-one para, they wouldn't have to stick with Title I duties. That para could do anything from bus duty to one-on-one tutoring to whatever was needed. And when you can free up staff to not be paid and not have to be worried about one funding stream, and that staff can truly just be who you need them to be and support whatever student you need to support, whatever grade level, it doesn't get more flexible than that.

That's the shift we've seen. That's... those are the success stories I've personally heard from principals, and we've seen the data trend in the right way.

So... Questions to you.

When you think about your current use of IDEA funds, are you funding programs, or are you actually funding outcomes?

What funding silos are you currently operating in that might be working against each other?

And then if a student is served from multiple federal programs, just like that one student we talked about, who pays for their services? And is it a disservice to them? Are you overwhelming them?

That's what I want you to think about.



That's all I have. Thank you so much for coming. I'm here if you have any questions. I kind of... it was such a high-level overview, there's so much more to break down. So, we're here to help you break it down if you need. But I'd be happy to take any questions in the last 6 minutes that we have.