



COORDINATING STATE AND FEDERAL FUNDS WITHIN THE PUPIL-CENTERED FUNDING PLAN

Under Nevada’s Pupil-Centered Funding Plan (PCFP), the state has combined many separate categorical funding sources. As a result, school districts, charter schools, and university schools for profoundly gifted students have more flexibility to coordinate PCFP funds to better serve students with complex needs. This flexibility can lead to providing students access to more coordinated and streamlined services rather than receiving multiple services from separate programs. This document provides guidance to school districts and schools on coordinating state and federal funds within the PCFP.

Before the PCFP, districts and schools had to manage many separate state grants with specific spending rules. This took time and effort away from what matters most: helping students learn. The PCFP combines most of that funding into one pot to simplify resource allocation for schools. While there are funding categories such as special education and weighted student funding (at-risk, English Learner, and gifted), the main source of funding for schools has been consolidated through the PCFP into the adjusted base funding allocation, which may be used more flexibly to meet the unique needs of students.

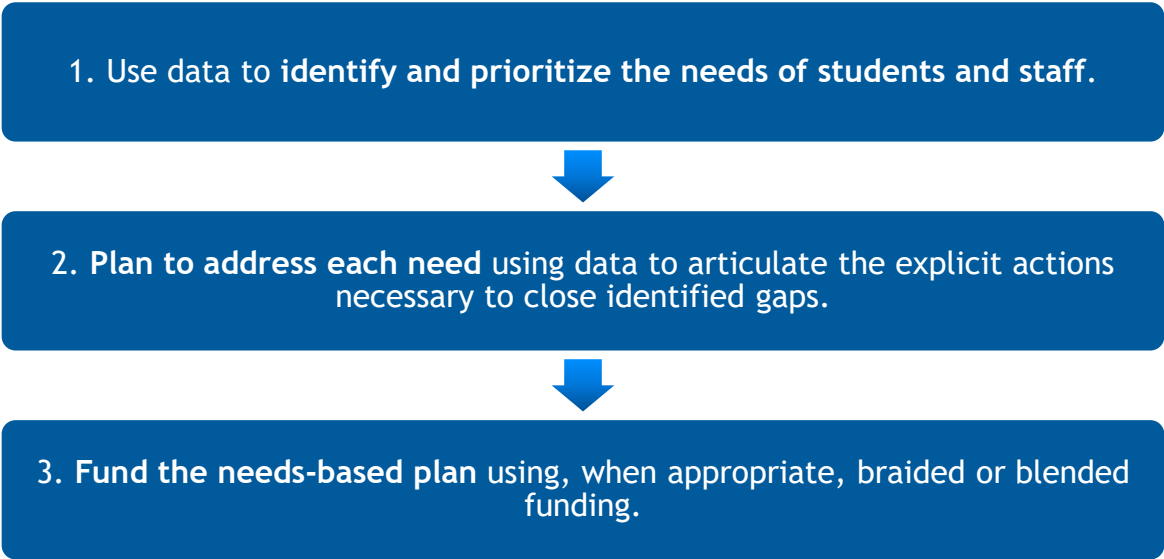
In transitioning to *a needs-based approach to planning*, entities identify needs as the drivers for the programs and services they design and deliver. Entities then allocate the appropriate resources to implement those programs and services.

NEEDS-BASED APPROACH TO PLANNING

The traditional approach to planning categorical funds follows a compliance-based approach in which the allowable use of funds drives the planning process. This means that districts and schools only planned and implemented activities prescribed under each program or funding source, and only students who qualified for the funding were served. With the greater flexibility offered by the PCFP, districts and schools can successfully plan and allocate resources to address the needs of students by adopting a needs-based approach to planning. As shown in Figure 1, this approach encompasses three major steps:

- 1. Using data to identify and prioritize the needs of students and staff
- 2. Developing a plan to address the needs identified and using data to articulate explicit action and services necessary to close identified achievement gaps
- 3. Funding the needs-based plan by using, when appropriate, braided or blended funding to allocate state and federal funds and resources to implement the plan

Figure 1. Needs-Based Approach to Planning



Source: WestEd, August (2020). Blending and Braiding Funds to Support Needs-Based Professional Learning.

In making this transition to fewer categorical funds under the PCFP, **districts need to focus first on what students need and *then* plan the design of programming.**

Coordinating PCFP and federal funds allows districts to:

- ✓ Better serve students with complex needs by providing access to streamlined services;
- ✓ Differentiate resources based on student need and not program eligibility; and
- ✓ Reduce duplication of effort with human and fiscal resources to maximize the impact of program delivery.

Further, the weighted student funding of the PCFP provides flexibility for school districts, charter schools, and university schools for profoundly gifted pupils to (a) decide which services best meet the needs of their students and (b) effectively coordinate different funds that may be used for eligible students or programs. For example, instead of offering professional development for teachers to learn instructional strategies that only address the needs of English Learners (ELs), the school district would provide districtwide professional development to teach instructional strategies that address the needs of EL (Zoom services), at-risk (Victory services), and low-performing (Title I services) students at the same time. Within this broader concept of a needs-based approach to planning, school districts, charter schools, and schools can take a more holistic approach to maximize their resources and coordinate programs and services to give eligible students the best possible educational experience.

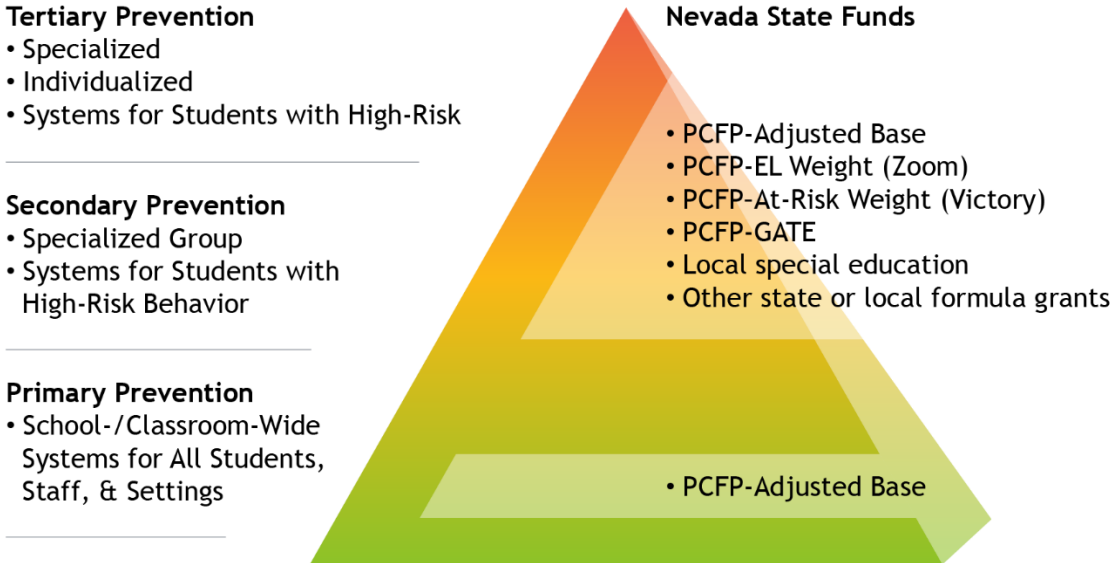
BRAIDING STATE AND FEDERAL FUNDS TO COORDINATE SERVICES

Braiding involves coordinating federal, state, or local funds to implement specific programs, with each stream maintaining its identity for reporting.

Federal law authorizes local education agencies (LEAs) and schools to coordinate and integrate federal, state, and local services when appropriate. Financing a single program using multiple funding streams is allowable provided the activities are permitted under the grant and align with the intent and purpose of the program.

When coordinating funds, the LEA and school must maintain separate documentation showing how each federal fund is spent. When allocating funds to support the coordination of resources, it is helpful to organize available funding into layers that align with the various types of support services students may need. These include three layers—universal, supplemental, and specialized—which closely align with the programs or services that follow the Multi-Tiered System of Support (MTSS) framework, as described in Figure 2 and Table 1 below.

Figure 2. MTSS Framework



Source: Nevada PBIS Technical Assistance Center, College of Education, University of Nevada-Reno and Nevada Department of Education. "Multi-tiered Systems of Support and the intersection of Discipline and School Behavioral Health." July 2023.

Table 1. MTSS Framework Funding Matrix

Tier	Support description	Funding description	Nevada state funds	Federal funds ¹
I	Universal Support includes evidence-based practices accessible by ALL students by integrating a Universal Design for Learning and differentiated instruction.	Universal Funds include state general funds. These funds have no restrictions, can be used for anything, and are often reserved for basic program needs.	<ul style="list-style-type: none"> PCFP-Adjusted Base 	Title I (for schoolwide programs)
II	Supplemental Support includes services provided to some students in addition to the universal supports available to all students to support academic, behavioral, social-emotional, and/or mental health through the integration of Universal Design for Learning and differentiated instruction.	Supplemental Funds include directed state and federal funds. These funds are intended to increase and improve program services for students and families that are historically underserved or in need of accommodations.	<ul style="list-style-type: none"> PCFP-Adjusted Base PCFP-EL Weight (Zoom) PCFP-At-Risk Weight (Victory) PCFP-GATE Local special education Other state or local formula grants 	<ul style="list-style-type: none"> Title I Title II Title III Title IV-A Title V IDEA (CEIS) CTE Perkins
III	Specialized Support includes intensified services provided to students with greater needs in addition to the universal and/or supplemental supports to support academic, behavioral, social-emotional, and/or mental health through the integration of Universal Design for Learning and differentiated instruction.	Specialized Funds include federal or state restricted grants. These funds are intended to increase or expand access to program services for students who need specialized services and need additional accommodations to meet individualized needs.	<ul style="list-style-type: none"> PCFP-Adjusted Base PCFP-EL Weight (Zoom) PCFP-At-Risk Weight (Victory) PCFP-GATE Local special education Other state or local discretionary grants 	<ul style="list-style-type: none"> Title I Title III Title IV-B Title V IDEA-B CLSD MCV Other federal grants

Source: Orange County Department of Education. “Guide to Implementing MTSS.” <https://ocde.us/MTSS/PublishingImages/Pages/Guide-to-Understanding-CA-MTSS/Guide%20to%20Implementing%20California%20MTSS.pdf> (2023).

¹ Federal funds must always supplement, not supplant, state-funded programs.

Example Scenarios of Coordinating Victory and Zoom Services with State and Federal Funds

This section describes different scenarios a school might encounter in any given year. Each scenario includes examples of services that a school may provide and a combination of state and federal funds that may be used to pay for those services. The PCFP-adjusted base is a universal funding stream that can also be used to fund a portion of any of the services listed below.

If the school were only using state funds in addition to adjusted base funding, it would also be allowed to use weighted funding proportionately based on the eligible students served by the program. If students were eligible for more than one funding category, either weighted funding source could be used (even though students only generated funding in one weighted funding category).

Since many students in special education or the weighted funding categories are also eligible for federal funding through Title I (low income), Title III (EL), and IDEA (special education), allowable uses can often overlap. Both state and federal funding can be coordinated to provide programs and services to a group of eligible students.

Eligible Pupils

An “eligible pupil” is a pupil who meets the eligibility criteria for one or more categories of weighted funding using current-year data. A pupil is considered eligible to receive allowable supports and services using the weighted student funding from all categories that they meet the eligibility criteria for even if (a) they were not included in the student count that generated weighted funding in the prior year or (b) they generated funds from a different higher weight funding category (or received special education funding).

The eligibility criteria for each category are as follows:

- **English Learner (EL):** a pupil who at the time they first enrolled in a Nevada school spoke a language other than English at home as their first language and achieved a score less than 4.5 out of 6.0 on the English Language screener.
- **At-Risk:** a pupil within the lowest quintile of pupils determined to be the most in need of additional services and assistance to graduate. Currently, this at-risk quintile determination is operationalized using Infinite Campus’s machine learning model that assigns a “GRAD score” to students. The GRAD score estimates the student’s likelihood of graduating with their cohort based on 75

different factors. All students with a GRAD score within or below the lowest quintile are considered “at-risk.”

- **Gifted and Talented:** a pupil who possesses or demonstrates outstanding ability in one or more of the following: (a) general intelligence, (b) academic aptitude in a specific area, (c) creative thinking, (d) productive thinking, (e) leadership, (f) the visual arts, or (g) the performing arts (NAC 388.435).

Scenario A: Summer Academy

Oner Elementary has analyzed recent end-of-year test data and seen that math scores have fallen across all student groups, but especially sharply for at-risk and EL students. Oner Elementary has also collected parent and student survey data that identifies math as an area where families would like more support. To address these needs, the school plans to offer a summer academy on math for students of all grade levels who are below proficiency. Participating students include EL, EL and at-risk, at-risk only, and students not in any of these categories.

Table 2 describes the services and funding sources the school plans to use in proportion to the benefits received by the number of EL and at-risk students served.

Table 2. Scenario A: Summer Academy Services and Funding

Oner Elementary services	Oner Elementary coordinated funding sources
Teachers (e.g., salaries, stipends) trained in EL needs provide push-in services for these students and other students in the academy.	<ul style="list-style-type: none"> Adjusted Base PCFP-EL Weight Title I, A
The academy provides students with supplemental learning materials to improve math skills.	<ul style="list-style-type: none"> Adjusted Base PCFP-EL Weight Title III, A

As summer programming is allowed under Zoom (EL weight) and Victory (at-risk weight) services and is allowable under Title I and III, Oner Elementary braided funding sources to align services with student groups. Table 3 shows the state and federal funding sources being coordinated by Oner Elementary to provide the summer academy.

Table 3. Scenario A: Funding Sources and Braiding Options

Student groups	Number of students	State funding source	State funds	Federal funding source	Federal funds
English Learners (ELs)	40	PCFP-EL Weight	30%	Title I, A	10%
EL and at-risk	20	PCFP-EL Weight	10%	Title III, A	10%
At-risk	30	PCFP-At-Risk Weight	20%	Title I, A	10%
Other	10	Adjusted Base	10%	N/A	-
Total	100	-	70%	-	30%

Note: EL and at-risk students would all be funded under the EL weight.

Scenario B: DistrictWide Professional Development

Nore School District’s prior year assessment data shows that students at every grade level are significantly below proficiency in English language arts (ELA), including EL, at-risk, and special education students. In addition to core instruction, which is funded by the PCFP-Adjusted Base, the needs assessment data indicates that differentiated instruction in ELA is needed to support these students to get on track to graduate. The district plans to provide professional development to instructional staff to address the needs of students who are significantly below proficiency.

Table 4 describes the services and funding sources the district may choose to use to fund professional development services.

Table 4. Scenario B: Professional Development Services and Funding

Nore District services	Nore District coordinated funding sources
<p>An outside consulting group leads a districtwide professional development series to improve instructional practices to meet the needs of each student group.</p>	<ul style="list-style-type: none"> • Adjusted Base • PCFP-EL Weight • PCFP-At-Risk • Title I, A • Title II, A • Local special education • IDEA-Coordinated Early Intervening Services (CEIS)
<p>A district liaison performs walk-throughs and provides feedback to site leaders about the impact the instructional practices are having on students.</p>	<ul style="list-style-type: none"> • Adjusted Base • PCFP-EL • PCFP-At-Risk • Title III, A
<p>Each school facilitates teacher collaboration to coordinate differentiated instruction.</p>	<ul style="list-style-type: none"> • Adjusted Base • PCFP-EL • PCFP-At-risk • Title I, A • Title II, A • Title III, A
<p>Professional development focuses on supporting educators by ensuring existing Individualized Education Plans (IEP) are met.</p>	<ul style="list-style-type: none"> • Adjusted Base • Local special education • IDEA, Part B

Table 5 includes the proportion of state and federal funding sources that can be coordinated to fund professional development.

Table 5. Scenario B: Funding Sources and Braiding Options

Student groups	Number of students	State funding source	State funds	Federal funding source	Federal funds
English Learners (ELs)	22	PCFP-EL Weight	10%	Title III, A	5%
EL and at-risk	12	PCFP-EL Weight	5%	N/A	-
At-risk	15	PCFP-At-Risk Weight	10%	Title I, A	5%
Low-performing	600	Adjusted Base	25%	Title I, A	20%
Students with disabilities	22	Local special education	5%	IDEA-CEIS IDEA, Part B	5% 5%
Other students	29	Adjusted Base	10%	N/A	-
Total	700	-	65%	-	35%

Note: EL and at-risk students would all be funded under the EL weight. Local special education funding represents the amount a school district and charter school would transfer from its general fund to maintain its federal maintenance of effort (MOE) requirement.

Scenario C: Gifted and Talented Education

Eron K-8 School has several students who participate in gifted and talented education (GATE). The school wants to implement a model that uses modified curricula in core content areas that will provide GATE students with an opportunity to remain in the general education classroom. In addition to core instruction, which is funded by the PCFP-Adjusted Base, the needs assessment data indicates that the following services are needed to support these students with access to accelerated learning opportunities.

Table 6 describes the services and funding sources the school plans to use in proportion to the benefits received by the number of EL and non-EL GATE students served.

Table 6. Scenario C: Gifted and Talented Services and Funding

Eron K-8 School services	Eron K-8 School coordinated funding sources
Universal screening of all 2nd grade students	<ul style="list-style-type: none"> • Adjusted Base
Assessment and identification of students for gifted programs.	<ul style="list-style-type: none"> • Adjusted Base
Consultation and collaboration with general education teachers	<ul style="list-style-type: none"> • Adjusted Base • PCFP-GATE
Parent activities that relate to student learning	<ul style="list-style-type: none"> • Adjusted Base • PCFP-EL • PCFP-GATE
Professional learning, with a portion of the training dedicated to gifted and talented students and ELs	<ul style="list-style-type: none"> • Adjusted Base • PCFP-GATE • PCFP-EL • Title II, A
Professional development focused on supporting educators by ensuring existing IEPs are met	<ul style="list-style-type: none"> • Adjusted Base • Local special education • IDEA

Table 7 includes the proportion of state and federal funding sources that can be coordinated to fund the gifted and talented services.

Table 7. Scenario C: Funding Sources and Braiding Options

Student groups	Number of students	State funding source	State funds	Federal funding source	Federal funds
English Learners (ELs)	2	PCFP-EL Weight	5%	Title III, A	5%
Other students	100	Adjusted Base	65%	N/A	-
Special education	6	Local special education	5%	IDEA, Part B	5%
GATE	20	PCFP-GATE	15%	N/A	-
Total	128	-	90%	-	10%

Note: EL and at-risk students would all be funded under the EL weight. Local special education funding represents the amount a school district and charter school would transfer from its general fund to maintain its federal maintenance of effort (MOE) requirement.

CONDITIONS FOR SUCCESSFULLY COORDINATING STATE AND FEDERAL FUNDS

The following conditions are considered best practices for coordinating funds:

- ✓ The LEA-wide and/or schoolwide improvement plan identifies a need for the initiative.
- ✓ The activities support LEA-wide and/or schoolwide programs.
- ✓ The activities are aligned to the original intent and purpose of each applicable funding source.
- ✓ The LEA and school participate in a continuous improvement planning process that includes monitoring the impact of improvement activities.
- ✓ The state education agency (SEA) provides training and support for LEAs and schools to identify opportunities to coordinate resources.

As illustrated in Table 8, many of the services allowable under Zoom and Victory have substantial overlap and can be supplemented with federal funds.

Table 8. Examples of Services and Coordinated Spending

Priorities/Needs/Services	PCFP-Adjusted Base	PCFP-EL	PCFP-At-Risk	PCFP-GATE	State/Local SPED	IDEA	Title I-A	Title 1003	Title I-C Migrant	Title II-A	Title III	Title IV-A SSAE	Title IV-B 21st CCLC	Title V RLIS
A summer academy or other instruction for pupils provided free of charge at times during the year when school is not in session	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
Professional development for teachers and other educational personnel concerning instructional practices and strategies that have proven to be an effective means of increasing pupil achievement in specified populations of pupils	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Additional instruction or other learning opportunities provided free of charge at times of day when school is not in session	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
Incentives for hiring and retaining teachers and other licensed educational personnel who provide specialized services	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No	No	No	Yes

Priorities/Needs/Services	PCFP-Adjusted Base	PCFP-EL	PCFP-At-Risk	PCFP-GATE	State/Local SPED	IDEA	Title I-A	Title 1003	Title I-C Migrant	Title II-A	Title III	Title IV-A SSAE	Title IV-B 21st CCLC	Title V RLIS
Integrated student supports, wraparound services, and evidence-based programs designed to meet the needs of at-risk pupils	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
A reading skills center	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	Yes	No
Employment of paraprofessionals, other educational personnel, and other persons who provide specialized services	Yes	No	Yes	No	Yes	Yes	Yes	No	No	No	No	No	No	Yes
Parent and family engagement and involvement	Yes	Yes	No	No	No	No	Yes	No	No	No	Yes	No	No	Yes
An extended school day	Yes	Yes	No	No	No	No	Yes	No	No	No	Yes	Yes	Yes	Yes

Priorities/Needs/Services	PCFP-Adjusted Base	PCFP-EL	PCFP-At-Risk	PCFP-GATE	State/Local SPED	IDEA	Title I-A	Title 1003	Title I-C Migrant	Title II-A	Title III	Title IV-A SSAE	Title IV-B 21st CCLC	Title V RLIS
Any other service or program that has a demonstrated record of success for similarly situated pupils in comparable school districts and has been reviewed and approved as a Victory or Zoom service by the Superintendent of Public Instruction	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
Tutoring for ELA	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes
Tutoring for math	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes
MTSS	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes
Attendance improvement	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	Yes	No	Yes
Social-emotional learning supports	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	Yes	No	Yes

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