

Emergency Regulation : Adjusted Base Pupil-Centered Funding Plan Payments, 10/28/2026

Question	Answer
Does the effective date of the emergency regulation (9/28/26) mean that the payments for July through September will be calculated: (a) based on the FY 27 PCFP numbers as well, (b) that those months will not be trued up for 1st quarter ADE and will continue to be based on the last fiscal year's 4th quarter ADE, or (c) that those months will be trued up and based on actual 1st quarter ADE, i.e., these months are not covered by the regulation?	The emergency regulation is effective for 120 days beginning on September 28, 2026. It is not retroactive. So, the emergency regulation only impacts the payments for October 1, 2026, through February 1, 2027. Due to the emergency regulation, the true-up process will result in payment increases only for districts, public charter schools, and university schools for profoundly gifted pupils that experience an enrollment increase greater than what was used to calculate payments for Q1 . If Q1 ADE is less than the enrollment used to determine the Q1 payments, no adjustment (or clawback) will occur.
Will the LEA continue to be funded using its actual quarterly ADE if the actual quarterly enrollment is greater than the legislative projection?	Yes. The payments for the first quarter of each school year are based on the 4th quarter enrollment from the previous year. If 1st quarter average daily enrollment number is greater than the 4th quarter enrollment (from the last school year), then the 2nd quarter payments (November, December, and January) will be based on the higher average daily enrollment number. Additionally, LEAs with a 1st quarter average daily enrollment that is greater than their 4th quarter average daily enrollment (from the last school year) will receive a 1st quarter true-up, resulting in additional funding to cover the enrollment growth.
For public charter schools, does a LEA's subsequently approved SPCSA enrollment amendment affect the emergency-regulation calculation, or is the comparison is strictly limited to the enrollment projection in the PCFP model supporting the legislatively approved FY27 budget?	The approved SPCSA enrollment amendment is not part of the ADE calculation. While the emergency regulation is in place, the adjusted base per pupil funding portion of each monthly payment will be based on a comparison of the projected average daily enrollment included in the legislatively approved budget and the most current quarterly average daily enrollment. The payments will be based on the higher number. For example, if the enrollment for a charter school for the first quarter of this school year is higher than the legislatively approved enrollment projection, then the current enrollment number will be used to calculate the for payments for November, December and January. (Remember, payments are based on the enrollment from the previous quarter.)
Does NDE currently anticipate any change to LEA's October through February adjusted base per pupil payments as a result of the emergency regulation.	Changes to the adjusted base per pupil portion of the monthly PCFP payment depends on the quarterly average daily enrollment. During the 120 days that the emergency regulation is effective, the adjusted base per pupil funding portion of the payment will be based on either the enrollment projection used in the legislatively approved budget or the most recently reported enrollment data, whichever is higher. Because actual enrollment data is reported at the end of each quarter (October, January, April, and July), the actual enrollment data for payments in future quarters cannot be updated.
The enrollment number listed for my particular school seems to be from the 2023-2024 school year; however, our charter school has grown considerably during the past four years. How will this be accounted for in the PCFP payments?	The projected enrollment in the Legislatively approved model for FY 2027 was developed based on the projected FY 2025 enrollment. While the emergency regulation is effective, the adjusted base per pupil portion of the PCFP payment will be based on either the enrollment projections included in the model that supports the legislatively approved budget for fiscal year 2027 or current enrollment numbers, whichever is greater. When the payment for October 1 is processed, the 4th quarter enrollment from the last school year will be compared with the number used in the legislatively approved budget. The adjusted base per pupil amount will be paid on whichever number is higher.
Will the funding be retroactive to the start of the fiscal year since the first quarterly true up hasn't occurred yet?	No. The Emergency Regulation is not retroactive. The August and September payments will not change. If a school district, public charters school or university school for profoundly gifted pupils has a 1st quarter average daily enrollment or if the legislatively approved enrollment is greater than the 4th quarter enrollment used for the August and September payments, then the 1st quarter true-up will distribute an increase in funding. No adjustments will be made if a decline in enrollment was experienced.
What happens to charter schools that were not open when the legislatively approved budget was established?	These LEAs will be paid based on their reported average daily enrollment or EEGA for Q1 (if applicable) unless the hold harmless is triggered. If enrollments increase, the true- up will calculate the additional payment. Protection is in place for declining enrollments.
Will the quarterly true-ups still be in effect? If we were paid on 4th quarter ADE and have now dropped, will we have to pay back the difference for August and September?	No. The August and September payments will not change unless enrollment growth is experienced. Additional payments will be made during the 1st quarter true-up to LEAs with an enrollment greater than was projected in the August and September payments.

Is there anything a LEA should submit to verify with NDE to ensure the correct enrollment information is being used.	NDE distributes the monthly payment book to LEAs. The payment book will be updated to document the current quarterly average daily enrollment and the projected enrollment in the legislatively approved budget. LEAs can review this data to confirm that the higher enrollment number was used to calculate the adjusted base per pupil portion of the monthly payment. Additionally, it is recommended that LEAs submit quarterly average daily enrollment (ADE) reports accurately and timely (by October 1st and by January 1st) so that NDE can validate the data and update the payment amounts quickly. LEAs may wish to submit the data prior to winter break rather than waiting until the January 1st due date, allowing NDE to complete the validation process and update the February 1 payment amounts earlier.
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