

Strategy 6: Braid, Blend, or Sequence Funding

Compliance Considerations - Table 1

Source	Summary
<p>Uniform Guidance Administered by the Office of Management and Budget (OMB)</p>	<p>Note - All federal agencies that award grants and cooperative agreements to non-federal entities are subject to the uniform guidance. Awardees including state, local and tribal governments, institutions of higher education, nonprofit and community based organizations are subject to uniform guidance as well as for-profits in some specific cases.</p> <p>Braiding - Generally allowed, no prior authorization but collaboration with OMB is encouraged. Funds must still be spent according to the requirements of each program, and documentation retained on how the federal funds are used. Activities funded must align with the purposes of the original grant programs. Use of funds must adhere to the specific rules and regulations of each funding source, even when braided.</p> <p>Blending - Typically requires statutory authorization, meaning there needs to be specific legal allowance for it in the program's governing law.</p> <p>Sequencing - Not directly addressed in the guidance however it does outline considerations for cash on hand, when drawdowns can occur, funding disbursement schedules, and prepayment allowances which can inform considerations for when sequencing may be valuable.</p> <p>See 2 CFR 200 for more info.</p>
<p>Workforce Innovation Opportunity Act (WIOA) Primarily Administered by the Department of Labor (DOL)</p>	<p>Braiding - Cost allocation considerations must be followed when multiple funding sources are paying for a portion of the same cost (e.g. training costs \$1,000, WIOA pays for \$800, and philanthropy pays for \$200). Allocations are calculated based on benefits received, such as hours worked. For braiding that involves funds made available for adult education and literacy activities under the Workforce</p>

	<p>Innovation and Act (WIOA), Title II: Adult Education and Family Literacy Act (AEFLA), grant shall supplement (support) and not supplant (take the place of) other State or local public funds expended for adult education and literacy activities. (29 USC 3331(a)).</p> <p>Blending - Does not mention or explicitly prohibit blending. Uniform guidance should be followed.</p> <p>Sequencing - Does not mention or explicitly prohibit blending. WIA sequencing of service requirements were removed under WIOA allowing for more partnership flexibilities.</p> <p>Final rules:</p> <ul style="list-style-type: none"> • Workforce Innovation and Opportunity Act; Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule • Workforce Innovation and Opportunity Act; Department of Labor Only; Final Rule • State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitations on Use of Subminimum Wage; Final Rule • Workforce Innovation and Opportunity Act, Miscellaneous Program Changes; Final Rule • Programs and Activities Authorized by the Adult Education and Family Literacy Act (Title II of the Workforce Innovation and Opportunity Act); Final Rule • Wagner-Peyser Act of 1933, • Wagner-Peyser Act Staffing; Final Rule • Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act (Section 188)
<p>Employment and Training Administration (DOL)</p>	<p>Braiding - States and local areas can braid funding to facilitate different programs that provide services to the same individual. States and local areas need to be aware of relevant statutes and regulations when braiding funding, as the funds, although they are used together, are still subject to all of the requirements and restrictions of the original funding source.</p> <p>Sample TELGs which are inclusive of guidance on braiding:</p> <ul style="list-style-type: none"> • Wagner Peyser

	<ul style="list-style-type: none"> • Competitive Integrated Employment (CIE) for youth and adults with disabilities. • Trade Adjustment Assistance Program Building Pathways to Infrastructure Careers One Workforce Strategy • Technical Assistance for Career Pathways <p>Other</p> <ul style="list-style-type: none"> • U.S. Departments of Education, Health and Human Services, and Labor letter on integrated career pathways • Yes WIOA Can, Effectively Leveraging or Braiding Multiple Funding Sources with WIOA • Braiding Webinar with the Office of Disability Employment Policy, Employment and Training Administration, the Centers for Medicare and Medicaid Services, the Administration for Community Living, the Rehabilitation Services Administration, the Office of Special Education Programs, the Substance Abuse and Mental Health Services Administration, and the Social Security Administration <p>Blending - Blending requires explicit authorization by law or regulation since the individual funding sources lose their distinct identities when combined.</p> <p>Sequencing - Many of DOL's initiatives mention sequencing of funding as a partnership opportunity.</p>
<p>Temporary Assistance for Needy Families (TANF) administered by Health and Human Services (HHS)</p>	<p>Braiding - TANF can be braided with other funding streams as long as the combined resources are used for TANF-eligible activities. States must maintain their historical effort (expenditures) on core welfare programs (like child care) even when braiding TANF funds. Clear accounting practices are needed to track how TANF funds are used and ensure they're not supplanting (replacing) other non-federal funds. The core objectives of TANF must still be met when braiding.</p> <p>Sample HHS Issue briefs which are inclusive of braiding:</p> <ul style="list-style-type: none"> • Primary care <p>Blending - TANF funds can only be blended with a very limited set of other funding sources, typically requiring specific statutory approval or waiver from the Department of Health and Human Services (HHS).</p>

	<p>Sequencing - TANF does not address any local level requirements on sequencing. Grants are provided to states. States have a good deal of flexibility in designing their TANF programs within federal guidelines, taking into consideration requirements like lifetime limits on receipt of benefits.</p>
<p>Supplemental Nutrition Assistance Program/Education and Training (SNAP/SNAP E+T) by USDA</p>	<p>Braiding - The USDA recognizes the benefits of braiding funding streams. The emphasis with braiding is generally on coordinating multiple funding sources to support a single program or set of services for a specific target population.</p> <p>Sample resources: Food and Nutrition Services SNAP Best Practices - Session on braiding</p> <p>Blending - Blending requires explicit authorization by law or regulation since the individual funding sources lose their distinct identities when combined.</p> <p>Sequencing - SNAP does not specifically address sequencing but its handbook does encourage working closely with partners.</p>
<p>Ticket to Work Administered by the Social Security Administration (SSA)</p>	<p>Note: Ticket to Work operates within the framework of Social Security Disability Insurance. Ticket to Work and Work Incentives Improvement Act of 1999 (TWWIIA) is the primary legal foundation for the program.</p> <p>Braiding - Does not require prior authorization, focuses instead on milestone payments for outcomes.</p> <p>Blending - Does not require prior authorization, focuses instead on milestone payments for outcomes.</p> <p>Sequencing - Ticket to Work does not specifically address</p>