

# Proposed 2025 Iowa Unified Allocation Plan

## Purpose and Summary

The Iowa Department of Education (IDOE) seeks the Secretary of the U.S. Department of Education's (USED) consideration of its waiver request of specific Federal statutory or regulatory requirements of the Elementary and Secondary Education Act of 1965, as amended by the [Every Student Succeeds Act \(ESEA\)](#), that are needed to implement its proposed unified allocation plan. (ESEA Section 8401(a)(1))

IDOE also seeks to implement its unified allocation plan through a combination of waivers, modernized administrative interpretations, and cost allocation options authorized by the Office of Management and Budget (OMB) under the Uniform Grant Guidance.

Iowa's unified allocation plan proposes to align nine ESEA programs to Iowa's state and local education priorities, while bolstering school improvement efforts informed by accountability and assessment and while supporting school districts' focus on best serving students most in need of support.

In the absence of an available template, please consider the following to be Iowa's formal waiver request submission.

This waiver request meets the statutory requirements, as it:

**“(A) identifies the Federal programs affected by the requested waiver”** as:

1. Title I, Part A;
2. Title I, Part B;
3. Title I, Part C;
4. Title I, Part D;
5. Title II, Part A;
6. Title III, Part A;
7. Title IV, Part A;
8. Title IV, Part B; and
9. Title V.

**“(B) describes which Federal statutory or regulatory requirements are to be waived”** to create a unified allocation plan to:

1. Allow **state administrative and state activities set-aside funds to be consolidated** based on existing statutory formulas;
2. Allow **school district formula and competitive funds to be consolidated** based on existing statutory formulas utilizing expanded transferability flexibilities;
3. Allow the IDOE to calculate and retain the **equitable participation proportionate share** in all relevant ESEA programs for school districts and nonpublic schools that opt in through meaningful consultation to provide equitable services to nonpublic school students and teachers through a third-party provider(s);
4. Explore opportunities to best support school districts in **prioritizing schools most in need of support through** revised USED administrative interpretations;
5. Modernize **supplement, not supplant** implementation across multiple ESEA programs through revised USED administrative interpretations.

**“(C) describes how the waiving of such requirements will advance student academic achievement”** by:

- targeting investments in our core priorities: a strong teacher pipeline, evidence-based literacy and mathematics instruction, school accountability and continuous improvement support, and multiple pathways to postsecondary success;
- supporting school districts’ focus on best serving students in need of support, including students who are English language learners, migratory, considered neglected and delinquent, and experiencing homelessness; and
- providing school districts with greater flexibility to allocate funding based on their specific needs, leading to more targeted interventions and programs that build upon their best practices and address the unique challenges faced by their communities.
- fostering innovation in school districts, including opportunities to better meet student needs that are not possible in the implementation of different ESEA programs.

**“(D) describes the methods the State educational agency will use to monitor and regularly evaluate the effectiveness of the implementation of the plan”** through its new USED-approved statewide school performance accountability system that:

- identifies and supports schools in need of improvement consistent with [IDOE’s 2024 USED-approved ESSA State Plan](#), utilizing all student achievement data and the disaggregated achievement data of student groups from annual assessments in at least grades 3-11 in English Language Arts (ELA) and Mathematics and grades 5, 8, and 10 in Science.

**“(E) includes only information directly related to the waiver request”** and

**“(F) describes how schools will continue to provide assistance to the same populations served by programs for which waivers are requested”** by:

- remaining steadfast in its commitment to ensuring the civil rights protections in ESEA, including school district requirements to provide specific services and supports to student groups, including students who are English language learners, migratory, considered neglected and delinquent, and experiencing homelessness.

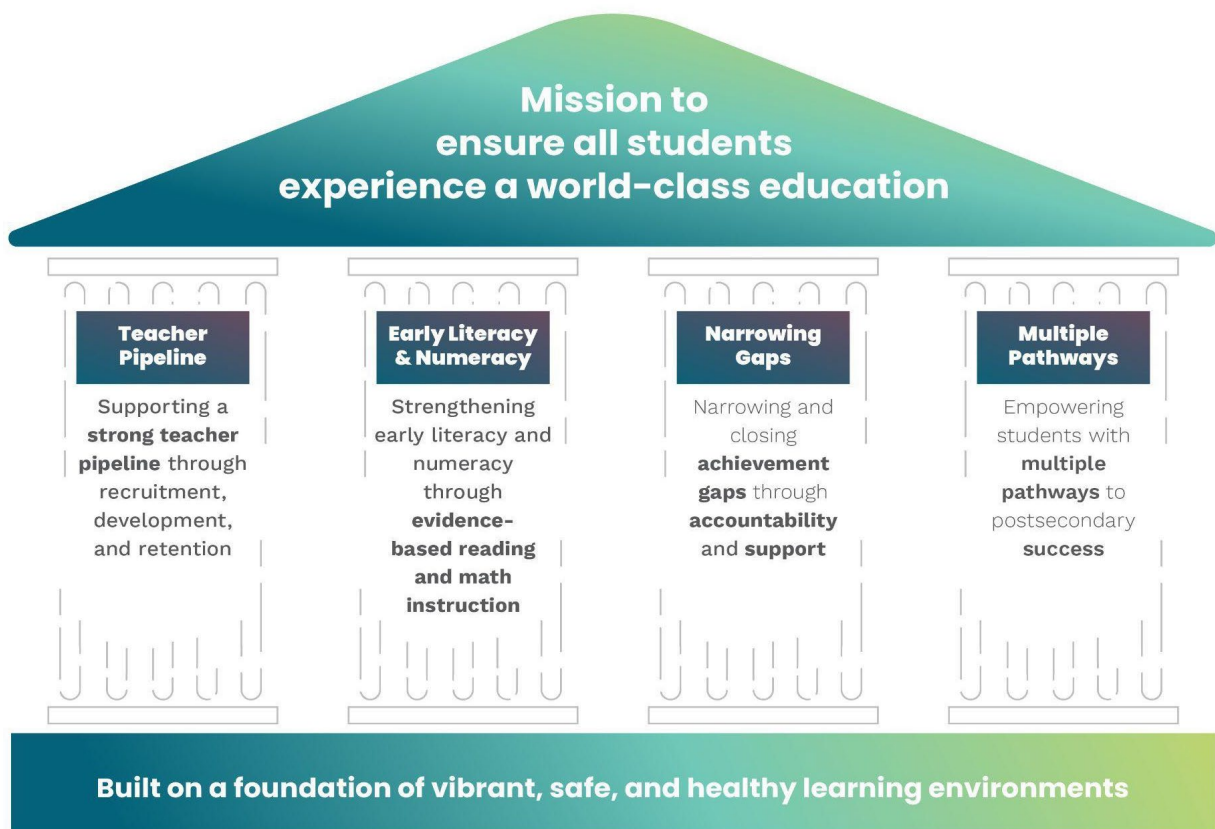
**Note:** IDOE does not seek waivers related to ESEA Section 1111(b) regarding challenging academic standards and academic assessments or (h) regarding Iowa’s annual state and school report cards, known as Iowa School Performance Profiles.

## Background

IDOE has developed a Consolidated Accountability and Support Application (CASA), which allows districts to complete one application to apply for all listed ESEA funds. This application process has been in place since 2019. CASA also functions as the mechanism for which schools submit aligned claims.

However, Iowa is limited in its ability to align the use of funds under multiple Federal programs to its top education priorities at both the state and local levels. Iowa's top education priorities, built on a foundation of vibrant, safe and healthy learning environments, are:

- Supporting a strong teacher pipeline through recruitment, development, and retention.
- Strengthening evidence-based literacy and mathematics instruction.
- Narrowing and closing achievement gaps through accountability and support.
- Empowering students with multiple pathways to postsecondary success.



Each of the five articulated requests is based on continuous comment and input received by the IDOE from the public, public school districts, public charter schools, nonpublic schools, and area education agencies—including from superintendents, curriculum directors, Title program coordinators, and the Nonpublic School Advisory Committee—as education leaders implement and ensure compliance with the numerous programmatic and fiscal requirements.

Feedback has included difficulty implementing specific, differing program requirements, including different allowability and fiscal management for each ESEA program, the provision of equitable services in meaningful consultation, and USED's administrative interpretation of "rank and serve" and varying supplement, not supplant requirements across ESEA programs. Grantees have shared that the regulatory burden associated with the administration of ESEA programs appears at odds with school districts' commitment to meeting the needs of diverse learners and realizing the purpose of the ESEA programs.

## Proposed Waiver Request:

### A. Programs affected by the waiver request:

Federal programs affected by the requested waiver to implement a unified allocation plan total about \$156.65M and include the following ESEA programs:

1. Title I, Part A (Basic Programs);
2. Title I, Part B (State Assessment);
3. Title I, Part C (Migrant);
4. Title I, Part D (Neglected and Delinquent);
5. Title II, Part A (Supporting Effective Instruction);
6. Title III, Part A (English Language Learners);
7. Title IV, Part A (Student Support and Academic Enrichment);
8. Title IV, Part B (21st Century Community Learning Centers); and
9. Title V (Rural Education Achievement Program).

### B. Federal statutory or regulatory requirements requested to be waived to create a unified allocation plan:

#### 1. Allow state administrative and state activities set-aside funds to be consolidated based on existing statutory formulas;

IDOE currently utilizes a portion of state administrative funds to provide state activities focused on its top state education priorities, and is consolidating its state administrative funds across ESEA programs and transferring allowable state set-aside funds through its existing authority.

Building upon that flexibility, rather than operate 21 separate state set-aside funding streams for nine different ESEA programs resulting in disjointed state investments, a single fund for only IDOE administrative and state activities across all listed ESEA programs totaling approximately \$10.86M will be managed by IDOE to make comprehensive investments in IDOE's established top education priorities focused on Iowa's schools and students most in need of support. While funds will be managed as a single, unified state set-aside, IDOE will continue to ensure that all expenditures are allowable under ESEA.

This waiver will better support IDOE's work to narrow and close achievement gaps and accelerate student achievement and growth, including through:

- Strategies for creating meaningful partnerships with families (consistent with Title I, Part A);
- Continued support for Iowa's state summative, alternate, and English learner assessments, including supporting the use of data to advance student achievement (consistent with Title I, Part B)
- Identification and educational supports for students who are migratory (consistent with Title I, Part C);
- Educational supports for students who are considered neglected and delinquent (consistent with Title I, Part D);
- Statewide professional learning supporting evidence-based literacy and math instruction for school leaders and educators, especially in identified schools and rural schools (consistent with Title II, Part A and Title V)
- Differentiated instructional strategies for students who are English Learners (consistent with Title III, Part A);
- Best practices in academic and enrichment programming, including out-of-school programming (consistent with Title IV, Parts A and B); and
- Development and use of comprehensive needs assessments.

**2. Allow school district formula and competitive funds to be consolidated together based on existing statutory formulas utilizing expanded transferability flexibilities;**

Iowa school districts currently leverage transferability flexibilities in Title II, Part A and Title IV, Part A through their existing authority. Building upon that flexibility, rather than operate about 1,400 different funding streams across 325 school districts for nine different ESEA programs resulting in disjointed local investments, a single fund across all listed ESEA programs for each school district or public charter school will be locally managed, totaling approximately \$145.79M across all school districts.

This waiver will better support school districts' work to narrow and close achievement gaps and accelerate student achievement and growth, including through:

- Strategies for creating meaningful partnerships with families (consistent with Title I, Part A);
- Identification and educational supports for students who are migratory (consistent with Title I, Part C);
- Educational supports for students who are considered neglected and delinquent (consistent with Title I, Part D);
- Statewide professional learning supporting evidence-based literacy and math instruction for school leaders and educators, especially in identified schools and rural schools (consistent with Title II, Part A and Title V)
- Differentiated instructional strategies for students who are English Learners (consistent with Title III, Part A);
- Best practices in academic and enrichment programming, including out-of-school programming (consistent with Title IV, Parts A and B); and
- Development and use of comprehensive needs assessments.

**3. Allow the IDOE to calculate and retain the equitable participation proportionate share in all relevant ESEA programs for school districts and nonpublic schools that opt in through meaningful consultation to provide equitable services to nonpublic school students and teachers through a third-party provider(s);**

For school districts and nonpublic schools that opt in through meaningful consultation, the equitable participation proportionate share required under Title I, Part A and Title VIII, Part F to provide equitable services to eligible nonpublic school children, teachers, and families will be facilitated by a third-party provider(s). This independent facilitator will provide equitable services to nonpublic school students and teachers, helping focus school district and nonpublic school partnerships on improving student achievement rather than compliance tasks.

The Title I proportional share under ESEA Section 1117(a)(4)(A) will be calculated using proportionality, applying the low-income percentage of public school children to the number of nonpublic school children residing in each attendance area, in accordance with USED guidance. The proportional share for all other remaining programs covered by Title VIII, Part F will be calculated solely on the basis of relative enrollments of public and nonpublic school children. Data from the IDOE's Student Reporting in Iowa (SRI) data collection will be used unless otherwise requested by the school district and nonpublic school in meaningful consultation.

**4. Explore opportunities to best support school districts in prioritizing schools most in need of support through revised USED administrative interpretation (ESEA Section 1113);**

While intended to ensure school districts are prioritizing those schools most in need of support, in practice, USED's administrative interpretation of "rank and serve" does not support coherent, district-wide school improvement investments that focus on students' academic needs. IDOE welcomes the opportunity to leverage a combination of existing statutory flexibilities to better support school districts in prioritizing schools most in need of support.

## 5. Modernize supplement, not supplant implementation across multiple ESEA programs (Title II, III and IV) through revised USED administrative interpretations.

While intended to ensure that Federal funds do not supplant state and local investments in education, in practice, USED's administratively developed tests of "supplement, not supplant" under ESEA do not support best-leveraged school improvement investments. It results in unproductive school finance complications and does not appropriately reflect our collective confidence in local education leaders to ensure all resources are best directed to activities that accelerate learning growth and improve achievement for all students. Thus, the IDOE requests USED modernize its administratively developed tests of compliance with supplement, not supplant in Title II, III and IV.

Unlike Title II, III and IV, Title I requires LEAs to allocate funds at the school level making a school-based test possible in Title I, per [USED's 2019 guidance](#). For example, a USED test to affirm compliance with supplement, not supplant for Title II, III, and IV could be required only if the LEA's per pupil expenditures on instructional improvement (based on defined NCES account codes) is less than the prior year. If the LEA does not pass this first test, USED could implement its existing tests of compliance with supplement, not supplant in Title II, III and IV.

A modernized administrative interpretation would ensure the realization of the intent of supplement, not supplant, while addressing a status quo in which LEAs across the nation must continue the same compliant, but potentially lower student impact, uses of funds year over year.

## Focusing More Resources on Improving Student Achievement:

Currently, IDOE spends an estimated \$1,286,007 in staff time on Federal compliance, rather than leveraging the full expertise of our ESEA programs team to support instructional improvement. Through Iowa's proposed unified allocation plan, IDOE will invert that distribution of time and resources spent on compliance (currently 70-75%) v. improving student achievement (currently 25-30%), focusing an additional estimated \$758,122 in staff time and resources on priorities to advance all students' growth achievement and to narrow and close achievement gaps experienced by student groups.

**IDOE ESEA Programs Time Distribution (Compliance v. Improving Achievement)**

Position	Approximate % Compliance	Approximate \$ Compliance	Approximate New % Compliance	Approximate New \$ Compliance	Approximate \$ Reallocation to Achievement
Bureau Chief (1)	70%	\$130,898	30%	\$56,099	\$74,799
ACs (2)	75%	\$244,237	25%	\$81,412	\$162,825
EPCs (9)	70%	\$910,872	30%	\$390,374	\$520,498
<b>Total</b>	<b>70%-75%</b>	<b>\$1,286,007</b>	<b>25%-30%</b>	<b>\$527,885</b>	<b>\$758,122</b>

Likewise, Iowa's school districts spend an estimated \$51,894,495 in staff time on ESEA program administration, taking critical focus away from their true mission: high-quality instruction that improves student achievement. Through Iowa's proposed unified allocation plan, superintendents, school business officials (SBOs), principals, and district Title coordinators will recover significant time spent on compliance tasks including claims, applications, and reporting. Instead, up to \$28,241,764 in staff time and resources will be free to focus on instructional leadership, advancing state and local education priorities and meeting student academic needs.

## Iowa School District ESEA Programs Time Distribution (Compliance v. Improving Achievement)

Position	Approximate % Compliance	Approximate \$ Compliance	Approximate New % Compliance	Approximate New \$ Compliance	Approximate \$ Reallocation to Achievement
Superintendent (261)	20%	\$9,178,065	5%	\$2,294,516	\$6,883,549
SBO (325)	30%	\$8,886,150	15%	\$4,443,075	\$4,443,075
Principal (1,168)	20%	\$27,564,800	10%	\$13,782,400	\$13,782,400
District Title Coordinators (65)	100%	\$6,265,480	50%	\$3,132,740	\$3,132,740
<b>Total</b>		<b>\$51,894,495</b>		<b>\$23,652,731</b>	<b>\$28,241,764</b>

## Monitoring and Evaluating the Effectiveness of the Unified Allocation Plan:

Recognizing Iowa's strong focus on accountability for student outcomes, the IDOE continues to rely upon its USED-approved statewide school performance accountability system, utilizing all student achievement data and the disaggregated achievement data of student groups from annual assessments in grades 3-11 in ELA and Mathematics and grades 5, 8, and 10 in Science.

IDOE will continue to use its school designations and its annual state and school report cards, known as Iowa School Performance Profiles, to inform system and school improvement investments. If these requests are granted, IDOE will leverage approximately \$10.86M totaling all listed ESEA program state administrative and state activities set-aside funds to advance its transformational work to identify and support schools in need of improvement and to meet statewide system needs, including practices that narrow and close achievement gaps and reduce chronic absenteeism.

Likewise, IDOE affirms its continued commitment and responsibility to:

- Develop and implement challenging state academic standards and aligned assessments, described in paragraphs (1) and (2) of Section 1111(b) of the ESEA and to produce the report cards required by ESEA Section 1111(h).
- Hold districts and schools accountable for meeting the educational goals described in the local applications and for engaging in technical assistance and, as applicable and appropriate, implementing comprehensive support and improvement activities and targeted support and improvement activities under ESEA Section 1111(d), consistent with IDOE's 2024 USED-approved ESSA State Plan.

IDOE also affirms its continued commitment and responsibility to implement and monitor:

- the allocation or distribution of funds to local educational agencies and other recipients;
- maintenance of effort;
- comparability of services;
- use of Federal funds to supplement, not supplant, nonFederal funds;
- equitable participation of private school students and teachers;
- parental participation and involvement;
- applicable civil rights requirements; and
- other specific matters in Section 8401 that are not subject to waiver.



## Providing Services and Supports to Meet the Needs of All Student Populations:

IDOE remains steadfast in its commitment to ensuring the civil rights protections in ESEA, including school district requirements to provide specific services and supports to student groups, including students who are English language learners, migratory, considered neglected and delinquent, and experiencing homelessness.

With an additional estimated \$758,122 in IDOE staff time and resources to improve student achievement, professional learning topics facilitated by the ESEA programs team will include, but not be limited to:

- Differentiated instructional strategies for students who are English Learners;
- Identification and educational supports for students who are migratory;
- Educational supports for students who are considered neglected and delinquent;
- Identification and educational supports for students who are experiencing homelessness;
- Strategies for creating meaningful partnerships with families;
- Best practices in out-of-school academic and enrichment programming; and
- Development and use of comprehensive needs assessments.

In school districts' consolidated application to the IDOE, school districts will articulate their ESEA services and supports plans to meet the unique needs of students who are English language learners, migratory, considered neglected and delinquent, and experiencing homelessness, including the submission of each school districts':

- Lau Plan to support students who are English Learners;
- Migratory liaison,
- Foster care/neglected and delinquent liaison;
- Partnerships with State-run institutions and residential facilities that support education continuity and successful transitions;
- Homeless liaison; and
- Partnerships with community-based organizations, especially in the provision of out-of-school programming.

## Next Steps:

The IDOE will provide the public, public school districts, public charter schools, nonpublic schools, area education agencies, community-based organizations, and State-run institutions and residential facilities with notice and additional opportunities to comment and provide input throughout the review and revision process. Upon USED's affirmation of the allowability of its requests for waivers, modernized administrative interpretations, and cost allocation options, IDOE will submit a summary of those comments and any corresponding revisions to the waiver request to USED. (ESEA Section 8401(b)(3)(A))

Should USED determine within 120 days that it requires additional information or modification in the Secretary's consideration of the waiver request, IDOE would look forward to revising its waiver request based on the technical assistance provided by the USED as soon as possible and within 60 days. (ESEA Section 8401(b)(4))

Iowa is grateful for Secretary McMahon's consideration of this request to waive specific Federal statutory or regulatory ESEA requirements that are needed to implement its proposed unified allocation plan. This plan will align ESEA program administration to Iowa's state and local education priorities, bolster school improvement efforts informed by accountability and assessment, and support school districts' focus on best serving students most in need of support.