

Revised Iowa Unified Allocation Plan Proposal

September 2025



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Introduction

Since March 2025, the Iowa Department of Education (IDOE) has appreciated the opportunity to work with the U.S. Department of Education (USED) to identify ways in which it may implement its vision for Iowa's first-in-the-nation Unified Allocation Plan proposal. Before and since it was first proposed, the IDOE has engaged a wide range of education stakeholder groups, carefully considering extensive feedback on how to best align ESEA programs and resources to Iowa's state and local education priorities.

Informed by its collaboration with USED and robust stakeholder feedback and engagement, IDOE seeks the U.S. Secretary of Education's 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)) to:

- **Align ESEA programs and resources 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.**

To better support students, families, educators, schools, and communities, Iowa's Unified Allocation Plan is structured around three distinct phases of flexibility and support.

- **Phase 1: State Educational Agency (SEA) Flexibility (Waiver Request)**

The primary focus of this plan is on streamlining state-level processes, consolidating resources, and reducing administrative burdens so programs can more effectively align with Iowa's statewide priorities.

- **Phase 2: Local Education Agencies (LEAs) Flexibility (Ed-Flex Waiver Request and Administrative Actions with No Waiver Requested)**

In response to USED and stakeholder feedback, IDOE will separately apply for Ed-Flex waivers to expand LEA-level flexibilities. Through Ed-Flex authority and utilizing existing ESSA flexibilities, LEAs will be able to administer fund allocations to meet their unique needs, increase efficiency, and direct resources toward student-centered supports.

- **Phase 3: Equitable Services Opt-in Options (Administrative Actions with No Waiver Requested)**

In response to USED and stakeholder feedback, IDOE will offer an opt-in feature, allowing an LEA and nonpublic school to, in meaningful consultation, choose to administer equitable services to eligible nonpublic school children, teachers, and families through support of third-party providers.

Together, these three phases establish **Iowa's comprehensive approach to implementing its Unified Allocation Plan**, balancing state-level efficiency, local autonomy, and equitable access to services. Based on feedback, the plan also emphasizes providing clear technical assistance, high-quality professional learning, and robust support for stakeholders to ensure a smooth and successful transition to this modernized, streamlined administration of ESEA programs.

Phase I – Waiver Request

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”:

(see [Appendix A](#)) (citations included)

1. Title I, Part A (Basic Programs):
 - ESEA Section 1127(b), Section 8303
2. Title I, Part C (Migrant):
 - 1306(b), Section 8303(a),(b),(c)
3. Title I, Part D (Neglected and Delinquent):
 - Section 8303(a),(b),(c)
4. Title II, Part A (Supporting Effective Instruction):
 - Section 2101(d), Section 2104(a), Section 8303(a),(b),(c)
5. Title III, Part A (English Language Learners):
 - Section 8303(a),(b),(c)
6. Title IV, Part A (Student Support and Academic Enrichment):
 - Section 8303(a),(b),(c)
7. Title IV, Part B (21st Century Community Learning Centers):
 - Section 8303(a),(b),(c)
8. Title V (Rural Education Achievement Program):
 - Section 5224, Section 8303(a),(b),(c)

“(B) describes which Federal statutory or regulatory requirements are to be waived”:

1. The IDOE seeks to exercise the flexibility provided under Section 8201 of the ESEA (20 U.S.C. 7821), Consolidation of State Administrative Funds for Elementary and Secondary Education Programs, to consolidate **State administrative (for which IDOE has existing authority) and State activity set-aside funds**. This provision authorizes SEAs to consolidate administrative amounts across multiple federal programs when the majority of resources are derived from non-federal sources. **The majority of IDOE’s budget is derived from non-federal resources**. IDOE funding is 84.25% state, 15.53% federal, and 0.22% other funds. Exercising this authority— together with the requested reporting waivers—will allow IDOE to maximize flexibility in use of funds, reduce duplicative administrative costs, and better align resources with Iowa’s top educational priorities.

Eight federal programs, totaling \$151.3 million, are impacted through State administrative (\$1,441,728) and State activities set-aside funds (\$2,689,007). Accordingly, IDOE requests permission to consolidate these funds across applicable ESEA programs. Section 8401(a)(1) of the ESEA further authorizes the U.S. Secretary of Education to waive certain federal statutory and regulatory requirements for any ESEA program. By consolidating these funds, IDOE will be able to:

- Direct administrative funds toward broader cross-program activities, such as technical assistance, dissemination of best practices, enhanced monitoring, and fiscal support teams (8201(b)(2)(A)–(I));
- Streamline financial tracking and reporting using proportional allocation methods across the consolidated fund;
- Eliminate duplicative record-keeping otherwise required when each program maintains separate administrative cost records (8201(c)); and
- Apply unused administrative funds toward programmatic priorities in alignment with Title I and other programs (8201(e), (f)).

Consolidation will enable IDOE to focus resources on top state education priorities while maintaining strict compliance with ESEA requirements. Funds will be managed as a single unified pool, with expenditures tracked to ensure allowability. IDOE will use a proportional allocation method, distributing costs based on each program’s share of the consolidated pool of eligible ESEA funds.

2. IDOE requests authority to **consolidate reporting, compliance, and administrative requirements** for both state and local education agencies, while ensuring adherence to the core statutory purposes of the ESEA. IDOE’s **annual report**, populated through its Consolidated Accountability and Support Application (CASA) system, will integrate all required ESEA data and information across eligible programs into a single submission (see [Appendix B](#)).

Note: Iowa will also apply for Ed-Flex waivers under the Education Flexibility Partnership Act of 1999, as reauthorized by Section 9207 of the ESEA, amended by the Every Student Succeeds Act (ESSA). The Ed-Flex program permits IDOE to waive certain statutory or regulatory requirements for one or more included programs on behalf of participating LEAs (see [Appendix C](#)).

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

Exercising Section 8201 consolidation authority, together with Unified Allocation Plan waivers, will allow IDOE to deploy administrative resources more strategically—shifting staff time from fragmented compliance tasks toward technical assistance, fiscal oversight, and program improvement.

Priorities – Iowa’s Unified Allocation Plan will advance student achievement by:

- Targeting investments in core state priorities;
- Ensuring access to high-quality instructional materials and instruction in literacy and mathematics;

- Directing resources to students with the greatest needs;
- Reducing administrative burdens so more resources reach classrooms; and
- Using data to drive continuous improvement.

Efficiencies – reducing duplicative reporting and administrative burden will further advance achievement by:

- Allowing staff to prioritize district support that directly impacts students, rather than duplicative compliance tasks;
- Redirecting staff capacity to targeted assistance to student groups in need of support, including English learners, migratory students, and neglected or delinquent youth, as well as students with disabilities and students experiencing homelessness;
- Enhancing program monitoring and evaluation to quickly identify performance lags and adjust supports; and
- Promoting cross-program collaboration so federal resources address the most pressing barriers to learner achievement.

Investments – consolidated funds will directly support:

IDOE has developed the Consolidated Accountability and Support Application (CASA), which allows districts to complete a single application to access all listed ESEA funds. This application system, in place since 2019, also serves as the mechanism for schools to submit aligned claims. To enhance oversight, IDOE will modify CASA by adding a State Activities and Administrative Cost to manage and monitor expenditures across ESEA programs. This improvement will increase transparency, strengthen accountability, and provide more timely access to critical information.

Despite these advancements, Iowa’s ability to align funding across multiple federal programs with its top education priorities remains constrained at both the state and local levels. Greater flexibility will allow Iowa to focus resources on:

- Strengthening **evidence-based literacy and mathematics instruction** as the foundation for long-term academic success;
- Supporting vibrant, safe, and healthy **learning environments**;
- Ensuring access to **multiple postsecondary pathways**, including through career and technical education (CTE), work-based learning (WBL), industry-recognized credentials (IRCs), advanced coursework, and dual enrollment;
- Maximizing flexibility so resources can be directed toward accelerating learning to **narrow and close achievement gaps**;
- Strengthening school **accountability and continuous improvement** systems through timely, data-driven interventions; and
- Growing and sustaining a **strong teacher pipeline** to ensure all students have access to effective educators.

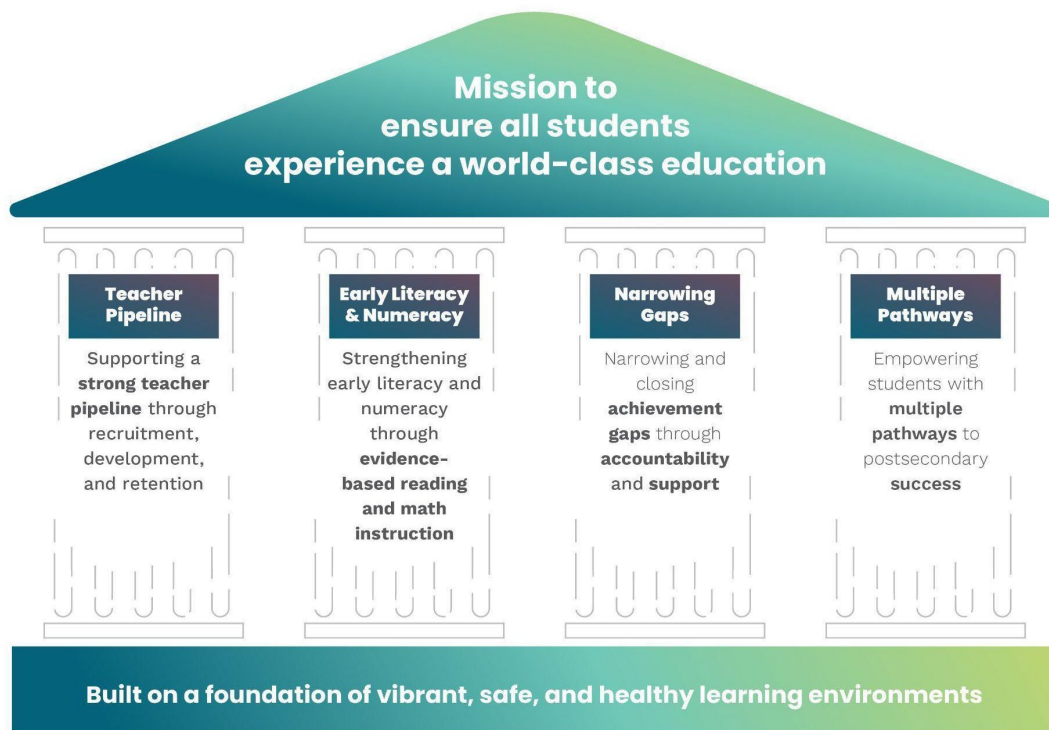


Figure 1: Iowa's Bold Vision

Each of these statewide priorities advanced over the past two years has proven to accelerate student achievement in Iowa.

1. Overall School Performance Improving

- In 2024-25, overall scores improved using the same high expectations as 2023-24, with nearly 56% of schools performing in the top three of six rating categories, up 10 percentage points compared to 46% of schools last year.
- Of 1,276 total schools, 41.9% (528 schools) moved up one or more rating categories.
 - 40.4% (510 schools) did not change rating categories.
 - 17.7% (223 schools) moved down one or more rating categories.

2. Early Literacy Improving

- Following the enactment of landmark early literacy legislation in 2024, students who were in third grade during the 2023-24 school year showed impressive gains as fourth graders in 2024-25, with proficiency increasing 11 percentage points from last year through:
 - Rigorous academic standards
 - High-quality instructional materials
 - Early student identification and progress monitoring
 - Strong instructional interventions
 - Evidence-based professional learning
 - Science of Reading-aligned educator preparation
 - Family-centered resources

- Since 2019, ELA results have also shown an 11 percentage point increase in grade eight.
 - Long-term results also show a five percentage point increase in fourth grade, a six percentage point increase in sixth grade, and a five percentage point increase in seventh grade.

3. Chronic Absenteeism and Attendance Improving

- Iowa's average chronic absenteeism rate dropped significantly to 15.8% for the 2024-25 school year, down 5.8 percentage points from the previous year. Like the nation, Iowa's chronic absenteeism rate peaked in the 2021-22 school year, reaching 25.6%. Over the past three years, Iowa's average chronic absenteeism rate has dropped 9.8 percentage points through:
 - Chronic absenteeism and attendance growth are prioritized in the school accountability system
 - 2024 State Chronic Absenteeism Reduction Work Group
 - Statewide professional learning
 - Intensive supports for student engagement in schools in need
 - Early warning system for students at risk of becoming chronically absent
 - 2024 state legislation to support statewide:
 - Notices to families at risk of chronic absenteeism
 - School engagement meetings with families
 - Absenteeism Prevention Plans for students missing school
 - Partnership with county attorneys

4. Work-based Learning Growing

- Iowa's 2024-25 results show a 19.5 percentage point increase—nearly 20 percentage point increase—(76% rate of increase) in WBL attainment of seniors over two years in 2024-25 through:
 - Work-based learning prioritized in school accountability system
 - Supporting a strong CTE educator pipeline by creating:
 - CTE Career Cluster Endorsement
 - WBL Authorization
 - 2024 state legislation to:
 - Recognize qualifying CTE courses for core credit
 - Create a consistent, high-quality definition of work-based learning
 - 2025 state legislation to:
 - Require career exploration beginning in fifth grade
 - Celebrate industry-recognized credential attainment with high school diploma seals
 - School District and Individual Career Academic Plans beginning in eighth grade
 - \$3.5M in Credentials to Careers grants to support IRC attainment and \$2.8M in STEM BEST grants to support WBL

5. Schools in Need of Support Improving

- Comprehensive Support and Improvement Schools Improved
 - IDOE provided over 6,000 hours of school-based expert leadership support and classroom coaching and modeling in Iowa's 35 Comprehensive schools during the 24-25 school year.
 - Thirty-two of 35 Comprehensive schools improved, increasing an average of 5.4 percentage points in their overall accountability score.
 - Eight Comprehensive schools increased by more than 10 percentage points.
- Targeted Support and Improvement Schools Exited
 - IDOE partnered with Iowa's nine AEAs to provide over 1,000 hours of consistent, school-based improvement supports in Iowa's Targeted schools.
 - 136 of 377 TSI schools identified in 2024 were able to exit Targeted status by ensuring all students are supported in meeting high expectations.
 - 99 Targeted schools were newly identified as Targeted in 2025, and 233 Targeted schools identified in 2024 did not exit status in 2025.
 - In total, the number of Targeted schools dropped by 39 schools, decreasing 10 percent from 377 in 2024 to 338 in 2025.

6. Teacher Pipeline Strengthening

- Iowa's teacher vacancy rate of 1.74 percent is lower than national data, showing three percent of all public school teaching positions were vacant during the 2023-24 and 2024-25 school years.
- Over the past two years, the number of educators in classrooms reached an all-time high, with more educators than ever before through:
 - Historic teacher pay raises for new teachers at \$50,000 and experienced teachers at \$62,000, investing a new \$96 million in teacher salaries.
 - Average beginning teacher salaries increased by approximately 45 percent over the past 15 years, while average overall teacher salaries went up by approximately 31%.
 - \$8.5 million in the Teachers Accelerating Learning Incentive Fund to celebrate outstanding teachers with supplementary pay.
 - Multiple, flexible pathways to licensure, including Governor Kim Reynolds' \$49 million Teacher and Paraeducator Registered Apprenticeship (TPRA) program, Teacher Intern Program, Content Area Specialist Authorization, Native Language Teacher Authorization and Career and Technical Authorization.
- Over the past 12 years, Iowa's educator workforce grew significantly by 10 percentage points.

“(D) describes the methods the State educational agency will use to monitor and regularly evaluate the effectiveness of the implementation of the plan”:

IDOE will ensure that **consolidated reporting keeps student achievement and narrowing and closing achievement gaps data at the forefront**, providing transparent, reliable measures of impact while safeguarding compliance with all ESEA requirements.

Specifically, IDOE will monitor the effectiveness of the Unified Allocation Plan primarily through its USED-approved statewide school performance accountability system, which is:

- Rigorous, reliable, and fair across grade configurations, size, geography, and demographics;
- Supportive of continuous improvement;
- Aligned with high expectations for all students;
- Transparent and understandable for families, educators, communities, and taxpayers; and
- Designed to incentivize evidence-based practices.

School Identification and Improvement Supports

Consistent with Iowa’s 2024 USED-approved [ESSA State Plan](#), IDOE will continue to identify and support schools in need of improvement using all student achievement data, including disaggregated results for student groups from annual assessments in grades 3–11 (ELA and mathematics) and grades 5, 8, and 10 (science).

IDOE has developed a comprehensive school improvement team and support system for schools identified as Comprehensive Support and Improvement (CSI). This sustainable system empowers partners through differentiated support and data-informed decision making, fostering reflection, growth, and collaboration to advance student achievement.

CSI schools receive support throughout their three-year designation, including

- **Year 1:** Extensive site visit, with data analysis, leadership and teacher interviews, classroom observations, and system reviews, followed by a detailed report with recommendations that are embedded into school action plans.
- **Ongoing:** Monthly on-site support to build leadership capacity, analyze data, and refine goals and bi-weekly on-site support to strengthen instructional coaching and teaching through professional development, modeling, feedback, and sustainable practices.

Monitoring Effectiveness of the Unified Allocation Plan

IDOE will use multiple strategies to evaluate Unified Allocation Plan implementation and outcomes:

Key Performance Indicators (KPIs) of ESEA Programs

- Risk assessments are conducted for 100% of LEAs selected on a five-year cycle.
- 100% of LEA superintendents receive allocation balance reports four times annually.
- 100% of eligible districts have access to ongoing guidance and technical assistance.
- 100% of eligible districts maintain compliance with all applicable ESEA program requirements.

Systematic Data Collection

Data will be collected and analyzed through statewide systems, including:

- Consolidated Accountability and Support Application (CASA)
- Student Reporting in Iowa (SRI)
- Basic Educational Data Survey (BEDS)

- Iowa EdPortal and EdInsight Data Warehouse
- Iowa School Performance Profiles
- School Information Update (SIU)

Continuous Review and Feedback

- **Quarterly evaluations** of data against KPIs to identify trends, successes, and areas for adjustment.
- **Stakeholder engagement** through regular feedback from IDOE and LEAs.
- **Collaborative data analysis** by ESEA program consultants and the Bureau of Performance and Analytics to assess student achievement and Unified Allocation Plan effectiveness.
- **Findings communicated** to stakeholders and the public.

Compliance with Core ESEA Requirements

IDOE affirms its responsibility to monitor and enforce the following requirements:

- **Allocation and distribution of funds:** Calculated twice annually, published publicly, and uploaded into CASA for district use.
- **Maintenance of effort:** Regular oversight to ensure funds are used for authorized purposes and performance goals are achieved.
- **Comparability of services:** LEAs must maintain policies ensuring equivalence in staff, salaries, curriculum, and instructional supplies across Title I and non-Title I schools.
- **Supplement, not supplant:** IDOE staff are trained to assess allowability and provide guidance to LEAs.
- **Equitable participation of private school students and teachers:** Equitable shares are calculated, published, and managed through CASA, with consultation agreements reviewed by IDOE.
- **Parental participation and involvement:** IDOE supports LEAs with professional learning and guidance on family engagement strategies that improve attendance, reduce chronic absenteeism, and close achievement gaps.
- **Civil rights protections:** IDOE remains committed to ensuring protections and high-quality services for English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness.

Risk-Based Monitoring

As a federal pass-through entity, IDOE evaluates each subrecipient's risk of noncompliance (2 CFR § 200.332). The Bureau of ESEA Programs uses a two-fold approach:

- **Universal monitoring** of all subrecipients throughout the year; and
- **Targeted monitoring** of high-risk districts identified through annual risk assessments.

Monitoring practices include:

- Focused compliance reviews for high-risk districts while reducing burden for consistently strong performers.

- Interim data checkpoints with technical assistance for districts not on track.
- Adjustments to support (e.g., professional development, technical assistance) based on monitoring results.
- Annual refinement of consolidated processes to improve efficiency without compromising accountability.

Fiscal Accountability for Consolidated Funds

IDOE will track the use of consolidated funds consistent with Section 8201 by:

- Documenting the proportional allocation methodology across all consolidated ESEA programs;
- Using CASA to monitor expenditures and ensure allowability;
- Submitting annual consolidated reports to USED; and
- Participating in periodic USED reviews as required under Section 8201(d).

IDOE will track the use of consolidated funds consistent with Section 8201 requirements by:

- Documenting the proportional allocation methodology across all ESEA programs included in the consolidation;
- Using the CASA system to monitor expenditures and ensure allowability under ESEA;
- Submitting annual consolidated reports to USED to demonstrate accountability; and
- Participating in periodic USED reviews, as provided for in Section 8201(d), to demonstrate effective use of consolidated administrative funds.

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

This submission includes only information directly related to the waiver request.

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

The IDOE remains steadfast in its commitment to ensuring the civil rights protections in ESEA, including requirements for districts to provide specific services and supports to English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness. The IDOE is equally committed to ensuring that these student groups receive services that are not only compliant, but also higher-quality, more efficient, and more effective—accelerating academic progress and addressing student needs. This will be achieved by aligning federal funds with state priorities and providing additional professional development to strengthen local capacity.

Note: IDOE does not seek waivers related to the development and implementation of challenging state academic standards and aligned assessments described in Section 1111(b)(1) and (2) of the ESEA, nor to the production of annual state and school report cards required under Section 1111(h). Iowa will continue to publish these report cards through the Iowa School Performance Profiles. To increase visibility and transparency, the IDOE will create district-level report cards to provide an additional level of reporting and accountability.

Focusing More Resources on Improving Student Achievement

Currently, IDOE spends an estimated \$1,286,007 in staff time on Federal compliance activities, rather than fully leveraging the expertise of our ESEA programs team to support instructional improvement. Under Iowa’s proposed Unified Allocation Plan, this allocation will be inverted: staff time and resources currently devoted 70–75% to compliance and 25–30% to improving student achievement will be redirected, dedicating an additional estimated \$758,122 toward initiatives that advance all students’ growth and specifically target narrowing and closing achievement gaps among student groups.

Table 1 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
Total	70-75%	\$1,286,007	25-30%	\$527,885	\$758,122

Similarly, Iowa’s school districts currently spend an estimated \$51,894,495 in staff time on ESEA program administration, diverting critical focus from their primary mission: delivering high-quality instruction that drives student achievement. Through Iowa’s proposed Unified Allocation Plan, superintendents, school business officials (SBOs), principals, and district Title coordinators will reclaim significant time currently spent on compliance tasks, including claims, applications, and reporting. As a result, up to \$28,241,764 in staff time and resources can be redirected toward instructional leadership, advancing state and local education priorities, and addressing students’ academic needs.

Table 2 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
Total		\$51,894,495		\$23,652,731	\$28,241,764

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

Advanced by these administrative flexibilities in the Unified Allocation Plan, students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness will continue to receive targeted support. IDOE and local districts will ensure that:

- English learners have access to differentiated instruction and language development supports;
- Migratory students receive continuity of services and educational interventions tailored to their mobility and academic needs;
- Rural students benefit from equitable access to high-quality instructional materials, enrichment opportunities, and professional learning;
- Students experiencing homelessness receive coordinated services and supports that remove barriers to attendance and address their mobility and academic needs; and
- Juvenile justice-involved students are provided specialized academic and behavioral supports.

These supports will be integrated into professional development, technical assistance, and monitoring activities, ensuring that administrative flexibilities enhance—never diminish—services and supports for these student groups.

Unified Allocation Plan Stakeholder Feedback Summary

In developing the initial draft of Iowa's Unified Allocation Plan, the IDOE sought feedback from district and school leaders, Area Education Agencies leadership, curriculum directors and other education stakeholders. The IDOE gathered public comment through a statewide survey in August 2025 to assist in making final updates to the plan. This is IDOE's typical practice for gathering input on significant revisions or statewide initiatives such as its 2024 ESSA State Plan and its English Language Arts, Mathematics, Science, and Social Studies State Content Standards revisions, for all of which robust stakeholder feedback is critical (see [Appendix D](#)).

To gather specific feedback about equitable services to nonpublic schools, the IDOE provided an early opportunity for district superintendents to provide input on this potential change that is included as Phase 3 of the Unified Allocation Plan, for which no waiver is or will be requested. This optional feedback opportunity was open June 26-Aug. 4, 2025. Respondents were asked if the district would opt-in to having a third-party oversee and administer the nonpublic equitable shares program on behalf of their district. A majority of districts (52%, (n = 44) with a nonpublic school within their geographic boundary indicated the district would opt-in to this service if it were available.

Iowa's **Phase 1: Waiver Request**, as well as its **Phase 2: Ed-Flex Waiver Request and Administrative Actions** and **Phase 3: Administrative Actions** are all grounded in continuous feedback received from the public, public school districts, public charter schools, nonpublic schools, and Area Education Agencies—including superintendents, curriculum directors, Title program coordinators, and the Nonpublic School Advisory Committee. This feedback reflects the perspectives of education leaders responsible for

implementing and ensuring compliance with the numerous programmatic and fiscal requirements of ESEA programs.

Stakeholders highlighted challenges in implementing differing program requirements, including variations in allowability and fiscal management across ESEA programs, the provision of equitable services through meaningful consultation, and the USED's administrative interpretation of "rank and serve" and "supplement-not-supplant" requirements. Grantees indicated that the regulatory burden associated with ESEA program administration can conflict with districts' commitment to meeting the needs of diverse learners and fulfilling the intended purposes of the ESEA programs.

Before and since Iowa's Unified Allocation Plan was first proposed in March 2025, IDOE engaged a wide range of education stakeholder groups, carefully considering extensive feedback. The Unified Allocation Plan proposal has been presented multiple times to all superintendents. As a final step before submission to USED, the IDOE conducted a survey from Aug. 19 to Sept. 2, and promoted it broadly by:

- Posting the survey link on the IDOE [website](#) under the Public Comment and Hearings section;
- Publishing a [headline story](#) and including an article in the [Superintendent and Education Leaders Update](#);
- Providing a targeted survey through CASA; and
- Sending a personal invitation via email to every superintendent in the state.

The survey invitation read:

"The Department invites you to [participate in a survey](#) and provide feedback about Iowa's [Unified Allocation Plan](#). Iowa's first-in-the-nation Unified Allocation Plan proposes to align ESEA programs and resources 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. Gathering additional feedback from education stakeholders is an important step in further developing the plan. Please take the time to participate..."

Appendix A: Citations

1. Title I, Part A (Basic Programs);

- **ESEA Section 1127(b)**: SEC. 1127. [20 U.S.C. 6339] CARRYOVER AND WAIVER.

(b) WAIVER.—A State educational agency may, once every 3 years, waive the percentage limitation in subsection (a) if— (1) the agency determines that the request of a local educational agency is reasonable and necessary; or (2) supplemental appropriations for this subpart become available.

(B) EXCEPTION.—A local educational agency may lower the threshold in subparagraph (A)(i) to 50 percent for high schools served by such agency.

- **Section 8303**: SEC. 8303. [20 U.S.C. 7843] CONSOLIDATED REPORTING.

(a) IN GENERAL.—In order to simplify reporting requirements and reduce reporting burdens, the Secretary shall establish procedures and criteria under which a State educational agency, in consultation with the Governor of the State, may submit a consolidated State annual report.

(b) CONTENTS.—The report shall contain information about the programs included in the report, including the performance of the State under those programs, and other matters as the Secretary determines are necessary, such as monitoring activities.

(c) REPLACEMENT.—The report shall replace separate individual annual reports for the programs included in the consolidated State annual report.

2. Title I, Part C (Migrant);

- **1306(b)**: SEC. 1306. [20 U.S.C. 6396] COMPREHENSIVE NEEDS ASSESSMENT AND SERVICE-DELIVERY PLAN; AUTHORIZED ACTIVITIES.

(B) may be submitted as a part of a consolidated application under section 8302, if—

(i) the unique needs of migratory children are specifically addressed in the comprehensive State plan;

(ii) the comprehensive State plan is developed in collaboration with parents of migratory children; and

(iii) the comprehensive State plan is not used to supplant State efforts regarding, or administrative funding for, this part;

- **Section 8303(a),(b),(c)**: see above

3. Title I, Part D (Neglected and Delinquent);

- **Section 8303(a),(b),(c)**: see above

4. Title II, Part A (Supporting Effective Instruction);

- **Section 2101(d)**: SEC. 2101. [20 U.S.C. 6611] FORMULA GRANTS TO STATES.

(d) STATE APPLICATION.—

(1) IN GENERAL.—In order to receive an allotment under this section for any fiscal year, a State shall submit an application to the Secretary at such time and in such manner as the Secretary may reasonably require.

(2) CONTENTS.—Each application described under paragraph (1) shall include the following:

(A) A description of how the State educational agency will use funds received under this title for State-level activities described in subsection (c).

(B) A description of the State's system of certification and licensing of teachers, principals, or other school leaders.

(C) A description of how activities under this part are aligned with challenging State academic standards.

(D) A description of how the activities carried out with funds under this part are expected to improve student achievement.

(E) If a State educational agency plans to use funds under this part to improve equitable access to effective teachers, consistent with section 1111(g)(1)(B), a description of how such funds will be used for such purpose.

(F) If applicable, a description of how the State educational agency will work with local educational agencies in the State to develop or implement State or local teacher, principal, or other school leader evaluation and support systems that meet the requirements of subsection (c)(4)(B)(ii).

(G) An assurance that the State educational agency will monitor the implementation of activities under this part and provide technical assistance to local educational agencies in carrying out such activities.

(H) An assurance that the State educational agency will work in consultation with the entity responsible for teacher, principal, or other school leader professional standards, certification, and licensing for the State, and encourage collaboration between educator preparation programs, the State, and local educational agencies to promote the readiness of new educators entering the profession.

(I) An assurance that the State educational agency will comply with section 8501 (regarding participation by private school children and teachers).

(J) A description of how the State educational agency will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, particularly children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels, and provide instruction based on the needs of such students.

(K) A description of how the State will use data and ongoing consultation, as described in paragraph (3), to continually update and improve the activities supported under this part.

(L) A description of how the State educational agency will encourage opportunities for increased autonomy and flexibility for teachers, principals, or other school leaders, such as by establishing innovation schools that have a high degree of autonomy over budget and operations, are transparent and accountable to the public, and lead to improved academic outcomes for students.

(M) A description of actions the State may take to improve preparation programs and strengthen support for teachers, principals, or other school leaders based on the needs of the State, as identified by the State educational agency.

- **Section 2104(a):** SEC. 2104. [20 U.S.C. 6614] REPORTING.

(a) STATE REPORT. Each State educational agency receiving funds under this part shall annually submit to the Secretary a report that provides—

(1) a description of how the State is using grant funds received under this part to meet the purpose of this title, and how such chosen activities improved teacher, principal, or other school leader effectiveness, as determined by the State or local educational agency;

(2) if funds are used under this part to improve equitable access to teachers for low-income and minority students, consistent with section 1111(g)(1)(B), a description of how funds have been used to improve such access;

(3) for a State that implements a teacher, principal, or other school leader evaluation and support system, consistent with section 2101(c)(4)(B)(ii), using funds under this part, the evaluation results of teachers, principals, or other school leaders, except that such information shall not provide personally identifiable information on individual teachers, principals, or other school leaders; and

(4) where available, the annual retention rates of effective and ineffective teachers, principals, or other school leaders, using any methods or criteria the State has or develops under section 1111(g)(2)(A), except that nothing in this paragraph shall be construed to require any State educational agency or local educational agency to collect and report any data the State educational agency or local educational agency is not collecting or reporting as of the day before the date of enactment of the Every Student Succeeds Act.

- **Section 8303(a),(b),(c):** see above

5. Title III, Part A (English Language Learners);

- **Section 8303(a),(b),(c):** see above

6. Title IV, Part A (Student Support and Academic Enrichment);

- **Section 8303(a),(b),(c):** see above

7. Title IV, Part B (21st Century Community Learning Centers);

- **Section 8303(a),(b),(c):** see above

8. Title V (Rural Education Achievement Program).

- **Section 5224:** SEC. 5224. [20 U.S.C. 7351c] REPORT.

Each State educational agency or specially qualified agency that receives a grant under this subpart shall prepare and submit an annual report to the Secretary. The report shall describe—

(1) if the report is submitted by a State educational agency, the method the State educational agency used to award grants to eligible local educational agencies, and to provide assistance to schools, under this subpart;

(2) how local educational agencies and schools used funds provided under this subpart; and

(3) the degree to which progress has been made toward meeting the objectives and outcomes described in the application submitted under section 5223, including having all students in the State or the area served by the specially qualified agency, as applicable, meet the challenging State academic standards.

- **Section 8303(a),(b),(c):** see above

Appendix B: Reporting

The IDOE will submit **annual reports** that include the required information as indicated in the table below.

Title Program	Report	Citation
Title I Part A	EDFacts - Title I School Status (authorized under Section 8303 of the Elementary and Secondary Education Act (ESEA))	ESEA Sections 1113(a)(2)(B) and 1113(b)(1)(A), 34 C.F.R. § 200.78(a)(1)
	EDFacts - Title IA Parent Involvement Reservation (authorized under Section 8303 of the Elementary and Secondary Education Act (ESEA))	ESEA Section 1116(a)(3), ESEA Section 1116(a)(3)(C)
	EDFacts - Title IA Private School Participation (authorized under Section 8303 of the Elementary and Secondary Education Act (ESEA))	ESEA section 1117(a)(4)(A); 34 C.F.R. § 200.64(a)(1)-(2))
	EDFacts -Title IA Reservation to Serve Homeless Children and Youth, (authorized under Section 8303 of the Elementary and Secondary Education Act (ESEA))	ESEA Section 1113(c)(3)(A) of the ESEA and 34 C.F.R. § 200.77(a)(1)-(2)
	Title I Part A Program Participation: SWP and TAS Programs, (authorized under Section 8303 of the Elementary and Secondary Education Act (ESEA))	ESEA Sections 1113(a)(2)(B) and 1113(b)(1)(A), 20 U.S.C. 6313
	Title I Part A LEA Low Income Count of Public School Students	ESEA section 1113(a)(6), ESEA Section 1113(a)(3) and 34 C.F.R. § 200.78(a)(1), ESEA Section 1113(a)(5)(A)
	Title I Part A LEA Low Income Count of Nonpublic School Students	ESEA section 1113(c) and 34 C.F.R. § 200.78(c)
	Title I, Part A Allocations	34 C.F.R.§§ 200.64, 200.77, and 200.78.1 and ESEA section 1117(a); 34 C.F.R. §§ 200.64(a) 200.77(d)).
	Title I, Part A – Excess Carryover Waiver	ESEA Section 1127(a), Section 1127(b)

Title Program	Report	Citation
Title I Part C	MSIX/MIS2000 CSPR Local Operating Agencies: Year-end Reports & Summer Year-end Reports IDRC Data-Iowa IMPACT Data-Iowa iSOSY Data-Iowa USED Final Grant Performance Reports X 3 CIGs USED Annual Performance Reports X 3 CIGs	ESEA Sec. 1304(b)(3) and Sec. 1308(b)(2). 34 C.F.R. § 200.89(c). ESEA Sec. 8303. ESEA Sec.1304(e) ESEA Sec. 1308(d) ESEA Sec. 1308(d) ESEA Sec. 1308(d) EDGAR Sec. 75.118 and 75.590 EDGAR Sec. 75.118 and 75.590
Title I Part D Subparts 1 and 2	Consolidated State Performance Report (CSPR)	Section 8303 [20 U.S.C. 7843] Consolidated Reporting; ESEA Section 1431 (a)
Title IIA	U.S. Department of Education's (USED) annual survey on the use of funds under the Elementary and Secondary Education Act (ESEA) Title II, Part A "Supporting Effective Instruction – Subgrants to LEAs" program for the 20xx - 20xx school year	Section 2104(a) of the ESEA
Title III	Consolidated State Performance Report (CSPR) EdFacts Biennial Surveys	ESEA Sec. 8303. ESEA Sec. 3201(7) ESEA Sec. 3115 (c) and (d) ESEA Sec. 3114(d) ESEA Sec. 3111(b)(2)(D) ESEA Sec. 3121. [20 U.S.C. 6841]
Title IVA	CSPR	ESEA § 4104(a)(2), 4104(a)(3), 4106(e)(2)(E)-(F)
Title IVB	Out of School Time Career Pathways (OSTCP) Annual Performance Report (APR)	EDGAR, 34 CFR § 75.253
Title V	21CCLC Biannual Virtual Check-Ins CSPR Part II FS131 End of School Year Status File Specifications	2 C.F.R. § 200.332(d) 34 CFR 76.720 ESSA Section 4203(a)(14) ESEA, Section 5224. Report Data submitted through EDPass are authorized by an Annual Mandatory Collection of Elementary and Secondary Education Data Through ED Facts (OMB 1850-0925). [ED Facts Data Group 614: REAP Alternative Fund Use Authority status] ESEA Sec. 5221 (a)(2)

Appendix C: Activities Aligned to State and Local Priorities

The table below outlines initiatives that align with Iowa’s state education priorities. This alignment provides clear guidance for decision-making and ensures that resources are directed toward programs and activities that support the state’s top priorities. Training, supports, and resources are focused on schools with high concentrations of poverty, rural communities, and high English learner enrollment.

Priority	Examples
<p>Strong teacher pipeline</p>	<p>Teacher recruitment, development, and retention supports:</p> <ul style="list-style-type: none"> ● Multiple, flexible pathways to licensure, including: <ul style="list-style-type: none"> ○ Teacher and Paraeducator Registered Apprenticeship (TPRA) program (\$49 million) ○ Teacher Intern Program ○ Content Area Specialist Authorization ○ Native Language Teacher Authorization ○ Career and Technical Authorization ● Historic teacher pay raises for new teachers at \$50,000 and experienced teachers at \$62,000 ● Teachers Accelerating Learning Incentive Fund to celebrate outstanding teachers with supplementary pay (\$8.5 million) <p>See also all priority-aligned professional learning statewide investments, supporting teacher preparation, development and retention.</p>
<p>Evidence-based literacy and mathematics instruction</p>	<p>Student identification, progress monitoring, and academic support and intervention:</p> <ul style="list-style-type: none"> ● Universal early literacy student screening and biweekly student progress monitoring ● Universal math student screening and biweekly student progress monitoring ● Intelligent, personalized reading tutoring for all students at scale statewide ● Take-home educational materials to support learning at home and everywhere, including decodables and math manipulatives <p>Professional Learning:</p> <ul style="list-style-type: none"> ● LETRS for PK-5 teachers ● LETRS for administrators ● Building Math Minds for K-6 teachers ● HQIM implementation fidelity professional learning and resources
<p>Narrowing Achievement Gaps</p>	<p>Student academic support and intervention:</p> <ul style="list-style-type: none"> ● Summer early literacy and math camps, Tier 2 and 3 students identified in our MTSS system ● English language acquisition summer and out-of-school programming ● Supplemental educational materials supporting students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness in succeeding in rigorous core and schoolwide HQIM <p>Professional Learning:</p> <ul style="list-style-type: none"> ● Differentiation for students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness

Priority	Examples
Multiple Pathways to Postsecondary Success	<p>Student supports:</p> <ul style="list-style-type: none"> ● Aligning core and CTE courses to student attainment of work-based learning experiences and industry-recognized credentials, including: <ul style="list-style-type: none"> ○ Student exam fees ○ Instructional equipment ○ Non-consumable instructional supplies ○ Computer equipment and software ○ Wired and wireless internet connections ○ Installation costs ○ Instructor training related to new equipment purchases ○ Instructor training expenses required to offer the credential ○ Curriculum enhancements
Vibrant, Safe and Healthy Learning Environments	<p>Student supports:</p> <ul style="list-style-type: none"> ● Supporting interventions articulated in Absenteeism Prevention Plans ● Removing barriers to attendance, including: <ul style="list-style-type: none"> ○ Basic Needs (e.g., food, clothing, communication) ○ Physical Health ○ Transportation ○ Mental and/or Behavioral Health ○ Challenging Behaviors <p>Professional Learning:</p> <ul style="list-style-type: none"> ● Engaging Learners ● Conversation, Help, Activity, Movement, Participation and Success (CHAMPS)
Other	<p>Professional Learning:</p> <ul style="list-style-type: none"> ● Data collection and analysis tools ● Assessment and data-based decision-making

Notes / Key Considerations:

1. Numerous activities focus on teacher professional development, which impacts student learning by strengthening instructional quality and leadership capacity. Student-directed initiatives—such as tutoring, after-school programs, and summer programming—are explicitly included under priorities that directly target achievement gaps.
2. Through established monitoring practices, the IDOE ensures schools serving students most in need of support—including schools with high concentrations of poverty, rural communities, and high English learner enrollment—receive priority access to training, technical assistance, and resources.

Appendix D: All Stakeholder Feedback, Responses, and Revisions

Under section 8401(b)(3)(A)(i)(III) of the Elementary and Secondary Education Act (ESEA), a State or local education agency seeking a waiver must describe how it addressed public comments on the waiver request.

The Iowa Department of Education (IDOE) conducted a statewide survey to gather feedback from stakeholders about Iowa's Unified Allocation Plan (UAP). The survey was open for two weeks, and the IDOE received 172 responses during the public comment period. To gather feedback, the IDOE followed our regular process that included an email to all 325 public district Superintendents, a feature announcement on the IDOE website and social media posts to solicit feedback from respondents.

The survey included a total of 16 questions. There were three background questions, four open-ended questions and nine Likert-style questions asking respondents to what extent they agree or support a proposed change to the federal requirement that is part of the Every Student Succeeds Act that Iowa is interested in waiving in the UAP.

Iowa received significant feedback during the public comment period, with the largest stakeholder group representing public school administrators (78%) from across the state. While there were comments from other stakeholders, no other group represented more than 5%.

Results show:

- Overall, respondents support Iowa's Unified Allocation Plan and statewide education priorities.
- Respondents indicated Iowa's Unified Allocation Plan would decrease administrative burden, allow for state and local flexibility in determining programming that is needed and focus resources and funding to bolster school improvement efforts and support students with the highest needs.
- Across several of the survey questions, there was a minority but sizable group of respondents who were undecided about Iowa's Unified Allocation Plan. This theme was also present in the answers to open-ended questions. Respondents felt they did not have enough detail about the Unified Allocation Plan to fully understand the implications of the change from current practice to provide meaningful feedback. The IDOE can address this theme through **high-quality technical support, education** and **support for districts** during the planning and implementation phase to ensure a successful transition to the modernized UAP.

Detailed Response to Survey Questions

This section provides a detailed summary of the feedback received from education stakeholders during the public comment period.

Background Questions

The survey first asked respondents three background questions: 1) if they are a resident of Iowa, 2) the stakeholder group they represent and 3) the geographic area in which they live. Answers to survey questions were optional.

QUESTION 1: *Are you a resident of Iowa?* (n = 172)

98.2% of respondents were Iowa residents.

QUESTION 2: *Which stakeholder group do you primarily represent as you complete this survey?* (n = 77)

Public school administrators were the largest group, representing 77.9% of survey respondents. Other stakeholder groups included nonpublic school administrators (5.2%), public school employees (3.9%), Area Education Agency personnel (3.9%), parents/caregivers (3.9%), members of the public (3.9%) and others (1.3%).

QUESTION 3: *In what Iowa education region do you currently live/work?* (n = 77)

There was a geographic spread of respondents across the regions of the state. The top three geographic areas where respondents work/live were Heartland (19.5%), Central Rivers (16.9%) and Green Hills (18.2%).

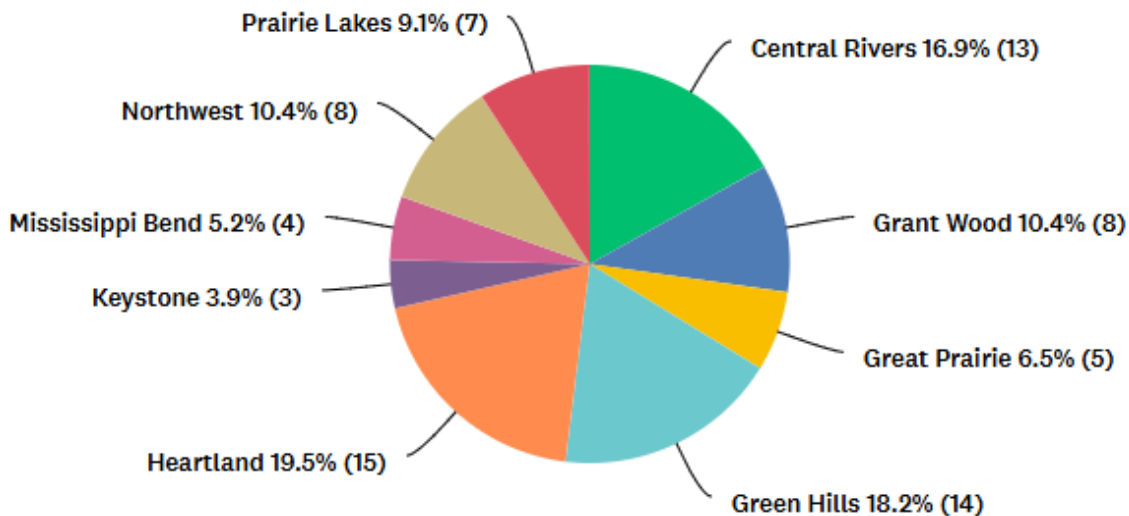
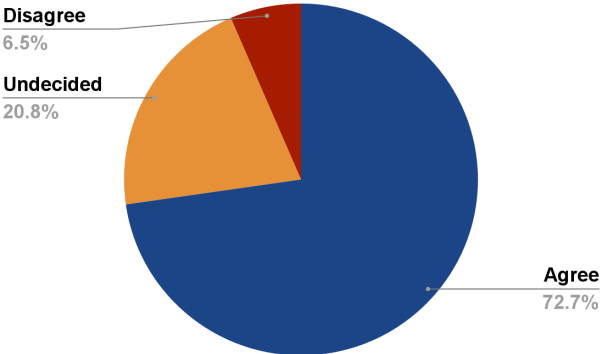
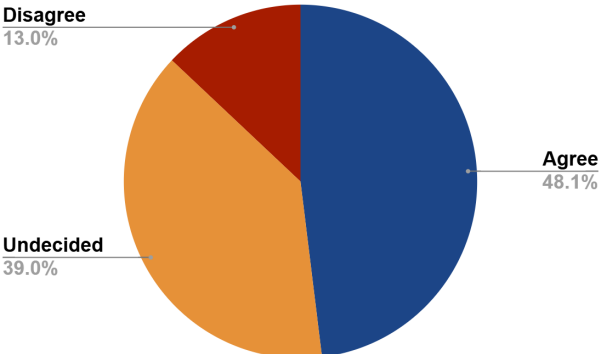


Figure 2: Geographic Area in which Respondents Live and/or Work

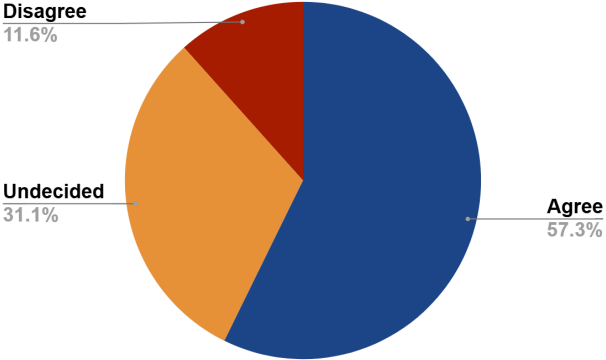
QUESTION 4

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 4: Iowa's Unified Allocation Plan will align ESEA programs and resources to Iowa's state and local education priorities. (n = 77)</i></p> <p>Note: Iowa's state education priorities are:</p> <ul style="list-style-type: none"> • 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. • Providing vibrant, safe and healthy learning environments.  <p>Figure 3: Responses to Question 4</p>	<p>A majority (73% of respondents indicated Iowa's Unified Allocation Plan aligns state and local priorities with ESEA programs.</p> <p>No change needed based on stakeholder feedback.</p>

QUESTION 5

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 5: Iowa's Unified Allocation Plan will bolster school improvement efforts and be informed by accountability and assessment. (n = 77)</i></p>  <p>Figure 4: Responses to Question 5</p>	<p>The largest percentage (48%) of respondents agreed that Iowa's Unified Allocation Plan will bolster school improvement efforts and be informed by accountability and assessment. However, 39% of respondents were undecided.</p> <p>No change in the Unified Allocation Plan is needed based on stakeholder feedback. However, further clarification about how Iowa's Unified Allocation Plan will support school improvement efforts is included in this revised proposal.</p>

QUESTION 6

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 6: Iowa's Unified Allocation Plan will support school districts' focus on best serving students most in need of support. (n = 77)</i></p>  <p>A pie chart illustrating the distribution of responses to Question 6. The chart is divided into three segments: a large blue segment representing 'Agree' at 57.3%, a medium orange segment representing 'Undecided' at 31.1%, and a small red segment representing 'Disagree' at 11.6%. Labels with leader lines point to each segment.</p> <p>Disagree 11.6%</p> <p>Undecided 31.1%</p> <p>Agree 57.3%</p> <p><i>Figure 5: Responses to Question 6</i></p>	<p>A majority (57%) of respondents agreed Iowa's Unified Allocation Plan will support school districts' focus on best serving students most in need of support.</p> <p>No change in the Unified Allocation Plan is needed based on stakeholder feedback. However, further information about how Iowa's Unified Allocation Plan will support students is included in this revised proposal.</p>

QUESTION 7

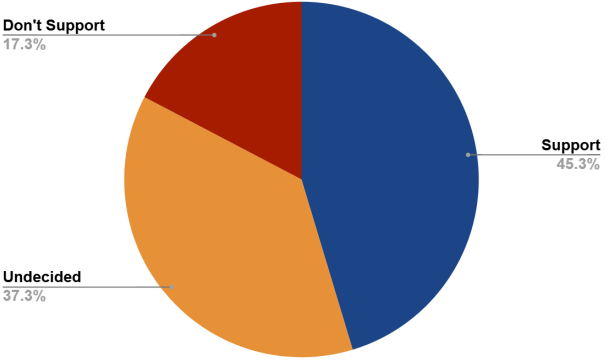
Results	IDOE Strategy to Address Public Comments
<p><i>Question 7: What other goals should Iowa's Unified Allocation Plan seek to achieve? (n = 21)</i></p>	<p>Twenty-one respondents provided additional comments about other goals the Unified Allocation Plan should seek to achieve.</p> <p>Five key themes can be found in respondents' comments:</p> <ol style="list-style-type: none"> 1) Flexibility and Local Control, 2) Funding and Resources, 3) Student-Centered Support, 4) Efficiency and Sustainability, and 5) Accountability and Equity. <p>The section below summarizes respondents' feedback and IDOE's response to each theme.</p>

Results	IDOE Strategy to Address Public Comments
<p>1) Flexibility and Local Control: Comments advocate for giving school districts greater flexibility and local control over how they use funds. Respondents want to ensure districts can use resources to meet their specific needs, rather than being bound by rigid state or federal mandates. There is concern that a centralized plan could limit a school's ability to innovate or address the unique challenges of its student population. This theme also includes the desire for local decision-making and alignment between state and district improvement plans.</p>	<p>Iowa's Unified Allocation Plan supports local control and allows for maximum flexibility in the programs that a district chooses to implement.</p> <p>Iowa's Unified Allocation Plan aims to align state and local priorities by offering flexibility in spending across federal programs. The approach empowers districts to focus funds on their most pressing needs and reduces administrative burden for both state and district staff.</p> <p>Less time on paperwork means more time dedicated to improving schools. Iowa will maintain the same level of accountability through the Unified Accountability Framework, which was approved by USED in 2024. The purpose of this framework is to identify and support schools and student groups that need it most.</p>
<p>2) Funding and Resources: A recurring theme is the need for adequate funding and resources. Commenters want to ensure that public schools receive the most resources possible and that funding is available to support specific initiatives. This includes providing monetary support for new programs, ensuring funding for schools with high poverty levels, and offering incentives to attract young adults to the education profession.</p>	<p>The amount of funding available for the state and each school district remains the same with or without the Unified Allocation Plan.</p> <p>Iowa's Unified Allocation Plan would assist the state and districts in maximizing funding by allowing for flexibility in the use of funds.</p>

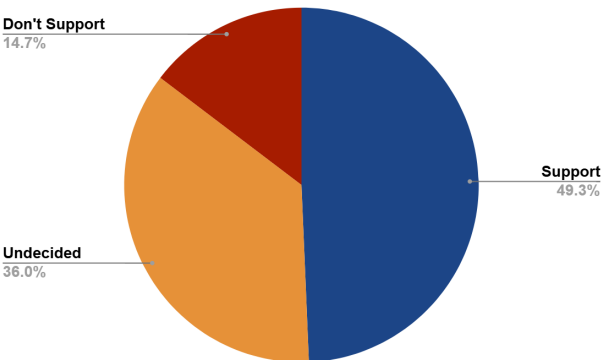
Results	IDOE Strategy to Address Public Comments
<p>3) Student-Centered Support: This theme highlights the importance of focusing on students' well-being and academic success. Comments mention the need for resources that directly support students with specific needs, such as those students with dyslexia or students in high-poverty areas. The well-being of students—including their mental, emotional, and physical health—is emphasized as a core part of program coordination. Other comments call for a direct link between funding and measurable improvements in student learning, engagement, and well-being.</p>	<p>IDOE has incorporated stakeholder feedback emphasizing the importance of student-centered support, well-being, and measurable academic outcomes. The Unified Allocation Plan ensures that funding and initiatives directly benefit students, particularly those with the greatest needs, including students who are English learners, migratory students, neglected or delinquent youth, students experiencing homelessness, and students in rural communities.</p> <p>The Unified Allocation Plan directs resources toward targeted interventions such as personalized tutoring, after-school and summer programming, attendance and dropout prevention, and evidence-based literacy and mathematics instruction. In addition, professional development for educators integrates strategies to support students' well-being.</p> <p>All initiatives are tied to measurable outcomes. Using data systems such as CASA, Student Success, and Iowa School Performance Profiles, the IDOE will monitor the impact of initiatives on student learning, engagement, and well-being. By aligning resources, supports, and monitoring with student needs, the Unified Allocation Plan ensures that administrative flexibilities directly advance students' academic growth, narrowing and closing achievement gaps.</p>

Results	IDOE Strategy to Address Public Comments
<p>4) Efficiency and Sustainability: Multiple respondents express a desire for greater efficiency and reduced administrative burden. The goal is to simplify reporting and compliance, allowing staff to spend less time on paperwork and more time with students. Additionally, there is a focus on ensuring that programs and improvements are financially and operationally sustainable, building long-term capacity rather than relying on short-term fixes.</p>	<p>The IDOE has incorporated stakeholder feedback regarding efficiency, administrative burden, and long-term sustainability into the Unified Allocation Plan. By consolidating State administrative and activity funds across multiple ESEA programs under Section 8201 authority and applying for Ed-Flex waivers, the plan reduces duplicative reporting, streamlines compliance, and simplifies program oversight.</p> <p>This approach allows both IDOE staff and local district personnel to devote more time and resources to direct support for students, instructional improvement, and targeted interventions rather than administrative tasks. Additionally, the plan emphasizes sustainable practices, including:</p> <ul style="list-style-type: none"> ● Proportional allocation methods and consolidated reporting to reduce redundancy; ● Integration of professional development and technical assistance to build district capacity; ● Strategic targeting of funds to initiatives with evidence-based impact, ensuring long-term effectiveness; and ● Monitoring and evaluation systems that provide ongoing data for continuous improvement and informed decision-making. <p>By addressing both efficiency and sustainability, the Unified Allocation Plan ensures that resources are deployed in ways that maximize student outcomes while building enduring organizational capacity at the state and local levels.</p>
<p>5) Accountability and Equity: Commenters also raised points about accountability and equity. They want to see consistent accountability measures for all schools receiving state funding and a fair distribution of resources. The goal is to ensure all schools in Iowa have equitable access to resources, with a particular focus on improving achievement.</p>	<p>Iowa's Unified Allocation Plan ensures consistent accountability for all schools while strategically targeting funding and support to schools and students with the greatest need.</p> <p>Transparent reporting and risk-based monitoring promote the effective use of resources to improve student achievement and narrow and close achievement gaps experienced by student groups.</p>

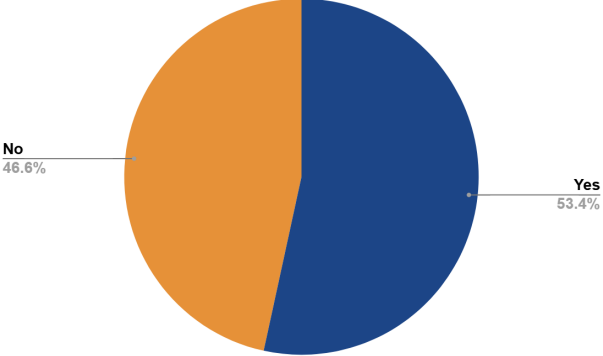
QUESTION 8

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 8: I support allowing state administrative and state activities set-aside funds to be consolidated based on existing statutory formulas. (n = 75)</i></p>  <p>The pie chart displays the distribution of responses to Question 8. The largest segment is 'Support' at 45.3%, represented by a blue slice. The next largest is 'Undecided' at 37.3%, represented by an orange slice. The smallest segment is 'Don't Support' at 17.3%, represented by a red slice.</p> <p><i>Figure 6: Responses to Question 8</i></p>	<p>The largest percentage (45%) of respondents support allowing state administrative and state activities set-aside funds to be consolidated based on existing statutory formulas. However, 37% of respondents were also undecided.</p> <p>No change in the Unified Allocation Plan is needed based on stakeholder feedback. However, further clarification about how these initiatives will be implemented is included in this revised proposal.</p>

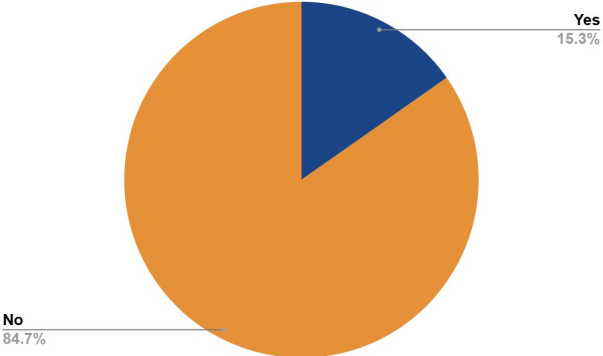
QUESTION 9

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 9: I support allowing school district formula and competitive funds to be consolidated based on existing statutory formulas. (n = 75)</i></p>  <p>The pie chart displays the distribution of responses to Question 9. The largest segment is 'Support' at 49.3%, represented by a blue slice. The next largest is 'Undecided' at 36.0%, represented by an orange slice. The smallest segment is 'Don't Support' at 14.7%, represented by a red slice.</p> <p><i>Figure 7: Responses to Question 9</i></p>	<p>The largest percentage (49%) of respondents support allowing school district formula and competitive funds to be consolidated based on existing statutory formulas.</p> <p>No change to Iowa’s Unified Allocation Plan is needed based on stakeholder feedback. Please recall this initiative is advanced in Phase 2: Local Education Agencies (LEAs) Flexibility (Ed-Flex Waiver Request and Administrative Actions with No Waiver Requested).</p> <p>In response to USED feedback, IDOE will separately apply for Ed-Flex waivers to expand LEA-level flexibilities. Through Ed-Flex authority and utilizing existing ESSA flexibilities, LEAs will be able to administer fund allocations to meet their unique needs, increase efficiency, and direct resources toward student-centered supports.</p>

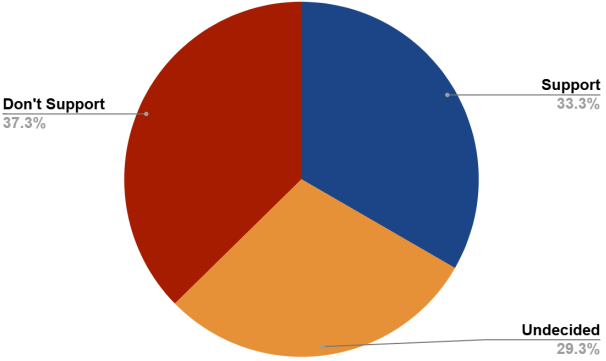
QUESTION 10

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 10: Should the following be required in school districts' consolidated application to the Department? 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. (n = 73)</i></p>  <p>A pie chart with two segments. The larger segment on the right is blue and labeled 'Yes' with '53.4%'. The smaller segment on the left is orange and labeled 'No' with '46.6%'.</p> <p><i>Figure 8: Responses to Question 10</i></p>	<p>A majority (53%) of respondents indicated the consolidated application should require information for supporting high-needs students, including English learners, migrant students, foster care students, homeless students and students in residential facilities.</p> <p>No change to Iowa's Unified Allocation Plan is needed based on stakeholder feedback. However, additional information articulating specific activities, supports, and interventions to support students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness is included in this revised proposal.</p>

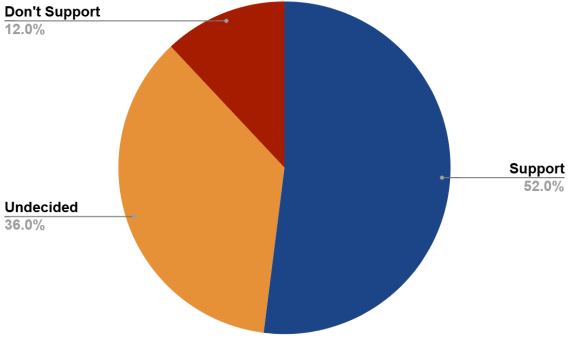
QUESTION 11

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 11: Should other requirements be included in school districts' consolidated application to the Department? (n = 72)</i></p>  <p>A pie chart with two segments. The large segment is orange and labeled 'No' with '84.7%'. The small segment is blue and labeled 'Yes' with '15.3%'.</p> <p><i>Figure 9: Responses to Question 11</i></p>	<p>A majority (85%) of respondents indicated IDOE should not include any additional requirements.</p> <p>No change to Iowa's Unified Allocation Plan is needed based on stakeholder feedback.</p>

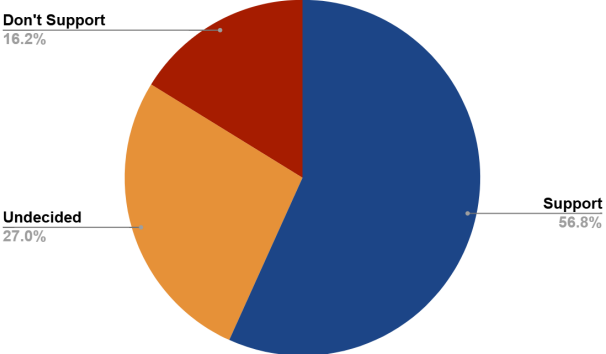
QUESTION 12

Results	IDOE Response to Stakeholder Feedback								
<p><i>Question 12: I support allowing the Department 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). (n = 75)</i></p>  <p>The pie chart displays the distribution of responses to Question 12. The largest segment is 'Don't Support' at 37.3%, followed by 'Support' at 33.3%, and 'Undecided' at 29.3%.</p> <table border="1"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Don't Support</td> <td>37.3%</td> </tr> <tr> <td>Support</td> <td>33.3%</td> </tr> <tr> <td>Undecided</td> <td>29.3%</td> </tr> </tbody> </table> <p><i>Figure 10: Responses to Question 12</i></p>	Response	Percentage	Don't Support	37.3%	Support	33.3%	Undecided	29.3%	<p>Responses were mixed on whether or not IDOE should calculate and retain the equitable participation proportionate share in all relevant ESEA programs for school districts using a third-party provider(s). The largest percentage (37%) did not support, with 33% supporting and 29% undecided in supporting this activity in the Unified Allocation Plan.</p> <p>In subsequent regional superintendents' meetings, district leaders provided additional feedback indicating they did not understand this question. Superintendents stated they thought that the proposal would allocate new and/or additional funds to equitable services for nonpublic school students and educators, and did not understand that the proportional share would remain the same. Superintendents stated they supported the option to use a third-party provider, as it could strengthen program delivery and reduce schools' compliance burden.</p> <p>No change to Iowa's Unified Allocation Plan is needed based on stakeholder feedback. Please recall this initiative is advanced in Phase 3: Equitable Services Opt-in Options (Administrative Actions with No Waiver Requested).</p> <p>In response to USED and stakeholder feedback, IDOE will offer an opt-in feature allowing an LEA and nonpublic school to, in meaningful consultation, choose to administer equitable services to eligible nonpublic school children, teachers, and families through support of third-party providers.</p>
Response	Percentage								
Don't Support	37.3%								
Support	33.3%								
Undecided	29.3%								

QUESTION 13

Results	IDOE Response to Stakeholder Feedback								
<p data-bbox="167 245 797 380"><i>Question 13: I support exploring opportunities to best support school districts in prioritizing schools most in need of support through revised USED administrative interpretation. (n = 75)</i></p>  <table border="1" data-bbox="183 401 748 737"><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>Support</td><td>52.0%</td></tr><tr><td>Undecided</td><td>36.0%</td></tr><tr><td>Don't Support</td><td>12.0%</td></tr></tbody></table> <p data-bbox="167 753 565 783"><i>Figure 11: Responses to Question 13</i></p>	Response	Percentage	Support	52.0%	Undecided	36.0%	Don't Support	12.0%	<p data-bbox="846 245 1451 380">A majority (52%) of respondents support exploring opportunities to best support school districts in prioritizing schools most in need of support through revised USED administrative interpretation.</p> <p data-bbox="846 405 1435 569">No changes needed based on stakeholder feedback. Based on USED's feedback, consideration of modernized USED administrative interpretations of rank and serve will be pursued outside of Iowa's Unified Allocation Plan.</p>
Response	Percentage								
Support	52.0%								
Undecided	36.0%								
Don't Support	12.0%								

QUESTION 14

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 14: I support modernizing supplement, not supplant implementation across multiple ESEA programs through revised USED administrative interpretations?</i></p> <p>Note: 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. Instead, 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. This would better 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. (n = 74)</p>  <p>Figure 12: Responses to Question 14</p>	<p>A majority (57%) of respondents support modernizing supplements, not supplanting implementation across multiple ESEA programs through revised USED administrative interpretations.</p> <p>No changes needed based on stakeholder feedback. Based on USED’s feedback, consideration of modernized USED administrative interpretations of the "supplement not supplant" principle will be pursued outside of Iowa’s Unified Allocation Plan.</p>

QUESTION 15

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 15: What do you see as the greatest benefit to Iowa’s Unified Allocation Plan? (n = 28)</i></p>	<p>Twenty-eight respondents provided comments about the benefits of Iowa’s Unified Allocation Plan. There were two primary themes that included potential significant benefits and support for the plan, while at the same time stating the need for more information.</p>

Results	IDOE Response to Stakeholder Feedback
<p>1) Benefits and Support: The overwhelming sentiment from respondents was in favor of streamlining and simplifying administrative processes.</p> <p>Many comments highlighted the desire for less bureaucracy, red tape, and reporting burdens on school districts. The shared goal of respondents (and the IDOE) is to free up time and resources so educators and administrators can focus more on instructional improvements and student outcomes instead of compliance tasks.</p> <p>There is also strong support for increased flexibility in how schools can use funds. Respondents' hope is that the plan would allow districts to direct resources to the areas of greatest need. A few comments also expressed a desire for more financial support, particularly for schools that need it most.</p>	<p>Iowa's Unified Allocation Plan addresses feedback on administrative burden and flexibility by streamlining reporting and consolidating multiple federal program requirements into a single application and oversight process. This approach reduces duplicative compliance tasks, empowering district and school staff to enhance their focus on instructional improvements and student outcomes.</p> <p>The plan also provides LEAs with greater flexibility to allocate resources according to local priorities, ensuring that funding can be directed to areas of greatest need, including high-poverty schools, rural communities, and schools serving high concentrations of English learners. Additionally, the Unified Allocation Plan strengthens support for districts through targeted professional development, technical assistance, and monitoring, enabling more efficient use of financial and human resources while sustaining long-term improvement efforts.</p>
<p>2) Additional Information Needed: Several respondents expressed a need for additional information, and some are concerned that, without more details, increased efficiency could come at the expense of student services.</p> <p>Several respondents mentioned they didn't have enough information to form an opinion. They feel that the details provided are too vague, with many questions left unanswered.</p>	<p>Significant additions throughout Iowa's revised Unified Allocation Plan proposal have been made based on stakeholder feedback, with the revised plan over six times the length of the original plan. See in particular Section C of the Waiver Request.</p> <p>As with any major initiative, IDOE will provide high-quality technical assistance to support a successful statewide transition, including training, support, and resources.</p>

QUESTION 16

Results	IDOE Response to Stakeholder Feedback
<p><i>Question 16: What do you see as the greatest challenges of Iowa's Unified Allocation Plan? (n = 26)</i></p>	<p>Twenty-six respondents provided comments about the greatest challenge of Iowa's UAP. These comments express a range of concerns and opinions regarding potential changes. The feedback highlights four key areas of concern:</p> <ol style="list-style-type: none"> 1) Targeted Supports for Vulnerable Students; 2) Lack of Clarity and Oversight; 3) Loss of Local Control and Increased Burden; and 4) Equitable funding to support schools and students.

Results	IDOE Response to Stakeholder Feedback
<p>1) Targeted Supports for Vulnerable Students: An emerging theme was the concern that proposed changes could negatively impact student groups without further information. Specifically, commenters suggested that consolidating or simplifying funding streams, like Title I, might reduce the visibility of these students' needs and inadvertently eliminate the guaranteed support they currently receive. There's a strong belief that funds should continue to be directed to schools and groups with the greatest need to avoid exacerbating existing achievement gaps. A few comments also expressed a desire for more financial support, particularly for schools that need it most.</p>	<p>Iowa's revised Unified Allocation Plans articulates specific student academic support and intervention, including:</p> <ul style="list-style-type: none"> ● Summer early literacy and math camps Tier 2 and 3 students identified in our MTSS system; ● English language acquisition summer and out-of-school programming; ● Supplemental educational materials supporting students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness in succeeding in rigorous core and schoolwide HQIM. <p>It also specifies professional learning to support differentiation for students who are English learners, migratory students, neglected or delinquent youth, and students experiencing homelessness. The original plan also articulates that LEA consolidated allocations must include:</p> <ol style="list-style-type: none"> 1) A Lau Plan to support English learners; 2) A migratory liaison; 3) A foster care/neglected and delinquent liaison; 4) Partnerships with state-run institutions and residential facilities to support education continuity and successful transitions; 5) A homeless liaison; and 6) Partnerships with community-based organizations, particularly for out-of-school programming. <p>Please recall that, in Question 10 of this survey, a majority of respondents (53%) supported these measures, and, in Question 11 of this survey, the vast majority of Iowa's revised Unified Allocation Plans articulates specific student academic support and intervention, including respondents (85%) who did not support additional requirements.</p>

Results	IDOE Response to Stakeholder Feedback
<p>2) Lack of Clarity and Oversight: Multiple commenters express a lack of understanding and a need for additional information. They state the financial impact on individual schools, the specific distribution methods (especially regarding a potential shift to competitive grants), and how oversight will be conducted is not articulated.</p>	<p>Significant additions throughout Iowa’s revised Unified Allocation Plan proposal have been made based on stakeholder feedback, with the revised plan over six times the length of the original plan. See in particular Section C of the Waiver Request related to how oversight will be conducted. IDOE will also continue to collect and report data on the Iowa School Performance Profiles and provide school improvement support, tools and resources to identified schools.</p> <p>As stated in the original plan, all requests are “based on existing statutory formulas.” There is no financial impact on individual schools and no change in the distribution methods. Iowa’s Unified Allocation Plan seeks to improve how federal funds are utilized, not change how they are allocated.</p>
<p>3) Loss of Local Control and Increased Burden: Several comments focus on the potential for removing local decision-making and shifting too much away from districts. There is also concern that public school districts could face an increased administrative burden, particularly if they are required to manage services for private schools. Respondents suggest that the state should handle these responsibilities to allow public schools to focus on their own students.</p>	<p>Phase 2: Local Education Agencies (LEAs) Flexibility (Ed-Flex Waiver Request and ESSA Flexibilities Administrative Actions with No Waiver Requested) significantly enhances LEA flexibility as district and school leaders make decisions to best use federal funds to meet student needs in their local communities.</p> <p>Section C of the Waiver Request streamlines LEA reporting requirements.</p> <p>Phase 3: Opt-in Options for Equitable Services Administrative Actions provides an option to allow an LEA and nonpublic school to, in meaningful consultation, choose to administer equitable services to eligible nonpublic school children, teachers, and families through support of third-party providers to strengthen program delivery and reduce schools’ compliance burden.</p>
<p>4) Equitable funding to support schools and students: While some comments mention that the current funding formulas are not equitable, there are also concerns that new formulas based on metrics like school performance could create new inequities. There's a belief that funding should support all students, regardless of income level, and that current methods—like using free and reduced lunch rates—don't capture the full scope of student needs.</p>	<p>As stated in the original plan, all requests are “based on existing statutory formulas.” There is no financial impact on individual schools and no change in the distribution methods. Iowa’s Unified Allocation Plan seeks to improve how federal funds are utilized, not change how they are allocated.</p>

Continued - Stakeholder Responses to Open-Ended Questions

QUESTION 17: What other goals should Iowa’s Unified Allocation Plan seek to achieve? (n = 21)

Comment
An area that emphasizes not just efficiency and alignment, but also children’s mental, emotional, and physical well-being as a core part of program coordination.
Based on the details in the proposal, the plan is designed to support school districts in better serving students most in need, but whether it will do so effectively depends on how it’s implemented.
Reduce redundant and burdensome federal reporting that takes staff away from students.
Positive support for our public education system. And, please, if time and resources are required, we need monetary support, as well.
Ensure that there is funding to entice young adults to choose education as a career.
Allow districts the flexibility to use funds to meet their specific needs.
Strengthening early learning alignment by expanding evidence-based literacy and numeracy interventions in PK-3. Develop a roadmap to ensure that improvements and programs launched with consolidated funds are financially and operationally sustainable after initial implementation. Use flexibility to see innovative instructional models, such as competency-based learning, blended/online pathways, or career-connected learning.
Same accountability measures for all schools receiving funding from the state.
The goals we have are excellent.
Giving schools local decision making.
Collaboration between the Iowa DE and LEAs to align state improvement plans that align with district improvement plans
Expanding supports for schools.
Provide support to students with learning disabilities like dyslexia.
Equity in providing resources to all schools in Iowa.
I appreciate the intent of Iowa’s Unified Allocation Plan to streamline funding and reduce redundancy. From my vantage point, there are a few additional goals that would make this plan even more meaningful: Clarity and Simplicity for Districts – Reduce administrative burden by ensuring guidance, applications, and compliance monitoring are clear, concise, and consistent. This allows leaders to spend less time on paperwork and more time focused on improving instruction. Alignment to Student Outcomes – Federal funds should directly tie to measurable improvements in student learning, engagement, and well-being, not just compliance with mandates. Flexibility to Innovate Locally – Provide districts with the latitude to use funds in ways that match the unique needs of their students and communities, while still honoring accountability requirements. Sustainability and Capacity Building – Ensure funds are used not just for short-term fixes, but to build long-term systems that strengthen teaching, leadership, and student supports. Stakeholder Engagement – Create structures for authentic collaboration with educators, families, and community partners so funds reflect real needs and build trust in the system.
Improving achievement and fostering equity.
Increase funding per pupil in all public schools.
Provide public school districts with the largest amount of resources possible.

Comment
I am still trying to figure out how money will be divided and what this will look like before deciding on other goals.
Personalized opportunities & support for students under the determination of local authorities.
Increased provision of resources and funding for school districts who have high poverty levels.
I do not support this Unified Allocation Plan as I believe it gives too much centralized control to the Dept of Education. Leave the control at the local level please. It also has the potential to disproportionately favor one priority over another.

QUESTION 18: What do you see as the greatest benefit to Iowa’s Unified Allocation Plan? (n = 28)

Comment
Alignment with State and Local Priorities and Targeted Support for Students Most in Need.
Same language and requirements for all.
Consolidation could streamline processes for administration however we must ensure any efficiency does not come at the expense of services for students.
More efficient funding aligned to priorities. Less time on compliance, more time on instructional improvements.
Flexibility based on local need, potential reduction in time and resources spent on reporting.
The theory behind it is good.
Flexibility
I do not have enough information to give feedback.
I am hopeful that the consolidation process will streamline the application and related processes including reimbursement requests. I am also hopeful that re-evaluating the meaning of "supplement not supplant" will bring more flexibility.
More flexibility for school districts to meet the needs of students with less time-consuming administrative hoops to jump through.
Finding ways to streamline funds is always something I am in support of doing. However, I am wary of this administration's ability to prioritize public schools in the state of Iowa.
Finding ways to streamline funds is always something I am in support of doing.
Lessening the reporting load on local school districts.
Less red tape for schools.
Flexibility
Simplifying reporting.
Hard to tell. Need a better explanation.
The greatest benefit of Iowa’s Unified Allocation Plan is that it simplifies and streamlines the use of federal funds so school leaders can spend less time navigating compliance silos and more time focusing on improving instruction and outcomes for students. By consolidating requirements into one unified system, the plan reduces duplication, provides flexibility to direct resources where they are most needed, and ensures accountability in a way that aligns with Iowa’s priorities. In short, it lets us keep our eye on what matters most—supporting students, especially those most in need.

Comment
Less administrative time required.
There are too many questions and not enough answers from the Iowa DE on this to know.
Allowing a district flexibility with these funds to spend more on the most needed areas without the burden of transferability, and a streamlined reporting process.
Reducing the reporting / application requirements.
We don't need more state control.
Increasing financial support for schools needing it the most.
None at this time.
None
Streamlining of resources and funds.
I do not see a benefit, and I do not support it.

QUESTION 19: What do you see as the greatest challenges of Iowa's Unified Allocation Plan? (n = 26)

Comment
Potential for Marginalized Students to Be Shortchanged - Many of the affected programs—like Title I for low-income students—were intentionally designed to direct resources to schools and groups with the greatest need. Simplifying the funding structure might reduce the visibility and guaranteed support these students currently receive.
Not every district has the same issues.
Supplement not supplant is not a waive-able provision under ESEA. While we understand the Department's desire for modernized administrative interpretations, it is incumbent upon us all to ensure that we do not exceed waiver authority. We believe we need to approach consolidation with caution to avoid inadvertently masking underfunding or exacerbating existing inequities.
If the dollars are provided as competitive grants, and if schools don't have the staffing capacity to write competitive grants to receive the funding, how are they to receive the funding (they currently receive non-competitively)?
The reality of implementation worries me.
Fear of losing the funding.
Increased and equitable partnerships between public districts and accredited non-public schools. Not all public districts treat accredited non-public schools fairly.
I do not have enough information to give feedback.
Really none
Meeting requirements without burying administrative staff and teachers in paperwork.
The underserved will likely be overlooked, and charter schools that are not a part of the largest district will benefit fairly.
Removing local decision making.

Comment
<p>The goal of the Department of Education should be to ensure that public schools are supported by public tax dollars. The current ability of families to use Students First ESA with excessive costs to the state of Iowa, with little to no oversight by the State Auditor's Office, provides me with even less confidence. The report plan provides little information on how oversight will be conducted. Both local school districts and the Iowa Department of Education should be subject to audits by the Auditor's Office with full transparency to ensure that these funds are being put to the best use and not to pay for additional administrative compensation, facilities, and materials. I am disappointed that the Monitoring and Evaluating section of the plan does not include the Auditor's Office.</p>
<p>Schools know what they need and are working hard to address areas of growth. The DE is too far removed from day to day work in school systems.</p>
<p>Current Title formulas are not equitable. Like size school districts do not receive the same funds. There is an assumption that more affluent districts have more money per student even though state funding is equalized across the state. Distributions based on current formulas will continue to create that inequity.</p>
<p>Support more students.</p>
<p>Making sure the funds are used for the purpose.</p>
<p>Hard to tell. Need a better explanation.</p>
<p>A significant challenge is the potential for added burden on districts if responsibilities for private school services are not clearly and fairly managed. Public schools should not be placed in a position of doing the administrative work for private schools. If this plan is to succeed, the Department must ensure that processes for equitable services are streamlined and, where possible, handled directly at the state level or through third-party providers so that districts can keep their focus on serving their own students.</p>
<p>Possible maintenance of effort issues.</p>
<p>There are too many questions and not enough answers from the Iowa DE.</p>
<p>Meeting current federal requirements when the funding was not adequate to start with.</p>
<p>Decreasing the flexibility of how resources can be used by districts.</p>
<p>So far lack of clarity of what it will look like you put 1-9 and the letters but really don't explain the financial impact as will schools with better scores but higher poverty receive less since scores are up? So will a district like Des Moines take a larger chunk and small schools get left out. I need a lot more information and details to try and have an informed answer to your survey. Since I am shared Supt. this will be for both districts. Thank you</p>
<p>Lack of real flexibility for public school officials to support their own students.</p>
<p>It is not equitable for all students. It looks at kids' needs based on F/R lunch rates, and that isn't helping all kids. Kids in all districts need academic support, mental health services and overall academic support, kids at all income levels.</p>
<p>I believe this gives way too much control to the Iowa Dept of Education and takes control away from local boards</p>

Appendix E: Phase 2 – Ed-Flex Waivers

Phase 2 of Iowa’s Unified Allocation Plan **focuses on applying for Ed-Flex waivers based on existing statutory formulas**. These waivers will provide school districts with greater flexibility to allocate funding according to their specific needs. This approach enables districts to implement more targeted interventions and programs that build on their existing best practices while addressing the unique challenges faced by their communities.

Note: The Ed-Flex waiver authority applies to the following sections of the ESEA:

1. **Title I, Part A** – Basic Programs Operated by LEAs (excluding Section 1111);
2. **Title I, Part C** – Education of Migratory Children;
3. **Title I, Part D** – Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At Risk;
4. **Title II, Part A** – Supporting Effective Instruction; and
5. **Title IV, Part A** – Student Support and Academic Enrichment Grants.

Title Program	Ed-Flex Waiver	Citation
Title I, Part A (Basic Programs)	<p>Waive the limitation that no more than 15% of Title I, Part A may be carried over except once every three years for the next five Federal fiscal years (FFY26 through FFY30).</p> <p>Allow 0% to up to 100% of Title I, Part A to be carried over every Federal fiscal year to support large investments in SEA-approved evidence-based student academic supports and school improvement activities.</p>	<p>Section 1114 (a)(1) (B) - Schoolwide Programs</p> <p>ESEA Section 1127(a) (b) - Excess Carryover Waiver</p>
Title I, Part D (Neglected and Delinquent)	<p>Waive the limitation that 15% to 30% of the SEA's Neglected/Delinquent funds support transition services for the next five Federal fiscal years (FFY26 through FFY30).</p> <p>Allow 0% to up to 100% of the SEA’s Title I, Part D funds to support transition services between the Iowa Department of Corrections (IDOC), Iowa Department of Health and Human Services (IDHHS) and LEAs. Such entities may have other funding sources that may cover the basic educational program for students, and Federal funds may be better leveraged on a greater investment in transition services.</p>	<p>ESEA Section 1428(a)</p>

Title Program	Ed-Flex Waiver	Citation
Title IV, Part A (Student Support and Academic Enrichment)	<p>Waive Title IV, Part A content area spending limitations capping Effective Use of Technology at 15% and requiring at least 20% for Well-Rounded Education and Safe and Healthy Students in certain LEAs for the next five Federal fiscal years (FFY26 through FFY30), providing LEAs flexibility regarding mandatory spending maximums and minimums for each content area.</p> <p>Allow 0% to up to 100% of the LEA's Title IV, Part A funds to be spent on Effective Use of Technology, Well-Rounded Education, or Safe and Healthy Students. Noting Iowa's top priority to promote vibrant, safe, and healthy learning environments, many LEAs would seek to utilize 100% of Title IV, Part A funds on Safe and Healthy Students to support comprehensive school safety investments.</p>	<p>ESEA Section 4106(e)(2)(C), (D), and (E) ESEA Section 4109(b)</p> <p>ESEA, Section 4106(d) Section 4109(b) Section 4106(e)(2)(C), (D), and (E)</p>

Once Ed-Flex waivers are approved, Iowa will utilize its **Consolidated Accountability & Support Application (CASA)** for each district to submit a waiver application to the IDOE. In the initial application, each LEA must address the following:

- The specific regulation(s) or portion of federal statute for which the LEA seeks flexibility;
- The purpose of exercising the funding flexibilities and how it will directly support increased student achievement and performance;
- The performance measures the LEA will use to track the effectiveness of the request and how results will be measured and reported; and
- The alignment between the LEA's stated performance measures and the long-term goals and accountability metrics outlined in Iowa's approved ESSA plan.

The IDOE will maintain regular oversight of grant recipients to ensure compliance with state and federal requirements, determine program effectiveness, and gather information for strategic planning. IDOE's monitoring activities will ensure that awards are used for authorized purposes and that performance goals are achieved. This existing oversight structure will be updated as necessary to align with the approved waivers.

In their consolidated applications to IDOE, school districts will outline plans to deliver ESEA services and supports that address the unique needs of students who are English learners, migratory, considered neglected or delinquent, and experiencing homelessness. Applications must include:

- A **Lau Plan** to support English learners;
- A migratory liaison;
- A foster care/neglected and delinquent liaison;
- Partnerships with **state-run institutions and residential facilities** to support education continuity and successful transitions;
- A homeless liaison; and
- Partnerships with **community-based organizations**, particularly for out-of-school programming.

IDOE is required to “evaluate each subrecipient’s risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring” (2 CFR § 200.332). The Bureau of ESEA Programs employs a two-fold monitoring approach under ESSA:

- **Universal monitoring** of all subrecipients throughout the year; and
- **Targeted monitoring** based on an annual risk review to focus on subrecipients with higher risk factors.

Note: Iowa school districts currently leverage flexibility in **Title II, Part A** and **Title IV, Part A** through existing authority.

Appendix F: Phase 2 – ESSA Flexibilities and Administrative Actions

The Iowa Department of Education (IDOE) will leverage the following flexibilities under the Every Student Succeeds Act (ESSA) to maximize the impact of state and local resources in support of student achievement, equity, and operational efficiency.

1. Direct Student Services (ESEA section 1003A)

- A State has the flexibility to determine whether to reserve a portion (up to three percent) of its Title I, Part A funds to support direct student services. (ESEA section 1003A).

2. Funding Transferability for States (ESEA section 5103)

- States and districts have broad flexibility under the ESEA to transfer some or all of their funds under certain ESEA programs to other eligible ESEA programs in order to better meet State and local needs. (See ESEA section 5103).

SEC. 5103. [20 U.S.C. 7305b] TRANSFERABILITY OF FUNDS.

(a) TRANSFERS BY STATES.—

(1) IN GENERAL.—In accordance with this part, a State may transfer all, or any lesser amount, of State funds (including funds transferred under paragraph (2)) allotted to the State for use for State-level activities under the following provisions for a fiscal year to one or more of the State's allotments for such fiscal year under any other of such provisions:

(A) Part A of title II.

(B) Part A of title IV.

(C) Section 4202(c)(3).

3. Consolidation of Funds for State Administration (ESEA section 8201(a))

- A State that can demonstrate that the majority of its resources are derived from non-Federal sources has the flexibility to consolidate funds specifically made available to it for State administration under any ESEA program, as well as other programs that the Secretary may designate. (ESEA section 8201(a)).

4. Consolidation of Funds for Local Administration (ESEA section 8203)

- Districts can consolidate administrative funds across ESEA programs with state approval, reducing reporting duplication and burden while increasing flexibility at the local level.

5. Consolidation of Funds in a Schoolwide Program (ESEA section 1114)

- Eligible schools with $\geq 40\%$ poverty consolidate Title I and other federal funds.

6. Small, Rural School Achievement (SRSA) (Title V, Part B) (ESEA section 5211(b))

- Following notification of IDOE by July 1 each year, use the Alternative Fund Use Authority (AFUA) to allow eligible districts to use the formula funds they receive under Title II, Part A and Title IV, Part A for any activities authorized under Title I, Part A; Title II, Part A; Title III; or Title IV, Parts A or B.

7. English Learner Student Group (ESEA section 1111(b)(3)(B))

- IDOE counts former English learners up to four years after exit in its statewide school accountability system to recognize the success of those students, families, and educators.

By applying these ESSA flexibilities, Iowa aims to:

- **Enhance direct student support** by reserving funds for interventions that target achievement gaps.
- **Increase efficiency and strategic resource use** through fund transferability and consolidation.
- **Narrow and close achievement gaps** by enabling LEAs and schools to prioritize funding for students with the greatest need.
- **Support sustainability** by reducing administrative burden and ensuring that resources are directed toward long-term capacity building rather than short-term fixes.

Appendix G: Phase 3 – Opt-in Options for Equitable Services Administrative Actions

In addition to the Unified Allocation Plan waivers, the IDOE will offer an opt-in feature allowing an LEA to choose to meet its federal statutory requirements under Title I, Part A and Title VIII, Part F to provide equitable services to eligible nonpublic school children, teachers, and families through support of third-party providers. LEAs and private school officials must jointly request to participate by completing the opt-in request section on the SEA-provided consultation agreement form. This option is intended to help focus school district and nonpublic school partnerships on improving student achievement rather than compliance tasks. The following ESEA programs are affected by the opt-in feature include Title I, Part A and all programs covered in Title VIII, Part F, which include:

1. Title I, Part C: (Migrant);
2. Title II, Part A (Supporting Effective Instruction);
3. Title III, Part A (English Language Learners and Immigrant);
4. Title IV, Part A (Student Support and Academic Enrichment);
5. Title IV, Part B (21st Century Community Learning Centers).

SEA Responsibilities:

The IDOE will oversee the opt-in feature implementation, including:

- Issuing a Request for Proposal (RFP) that follows State of Iowa procurement requirements and guidelines.
- Developing and publishing technical assistance for LEAs and nonpublic schools detailing state and federal equitable services requirements.
- Providing technical assistance through webinars, interactive sessions, and other formats to support effective implementation.
- Ensuring timely and meaningful consultation with nonpublic schools on multiple occasions each year.
- Upon approval of the consultation agreement, calculating and distributing the proportionate share to a third-party provider to manage and oversee equitable services within each state region.
 - Title I proportional share (ESEA Section 1117(a)(4)(A)) will be based on the low-income percentage of public school children relative to private school children in each attendance area.
 - Other programs under Title VIII, Part F will use relative public and private school enrollment counts.
- Ensuring third-party providers comply with equitable services requirements through oversight, technical assistance, and monitoring. The IDOE ombudsman serves as the primary contact for LEAs and nonpublic schools.

LEA Responsibilities:

- Facilitate an annual consultation meeting with nonpublic school officials to discuss:
- The equitable share amount

- Student and teacher needs
- Delivery of equitable services
- Jointly request a third-party provider if deemed the most effective delivery method via the consultation agreement form.
- Manage the fiscal responsibilities of the equitable shares, including submitting quarterly claims, approving expenditures, and monitoring service delivery. The LEA may delegate certain management tasks to the third-party provider.

Third-Party Provider Responsibilities:

- Adhere to statutory requirements under ESEA, including Sections 1117(b)(5) and 8501(c)(5).
- Submit all required documentation in the CASA system.
- Ensure participation of private school students and teachers in Title I, Part A, and all programs covered under Title VIII, Part F.
- Manage and oversee all equitable services delivery in alignment with the mutually agreed-upon plan between the LEA and nonpublic school officials.

All implementation will follow guidance from the [U.S. Department of Education Issues Equitable Service School Choice Guidance](#) to ensure full compliance and consistency with federal expectations.