



THE SECRETARY OF EDUCATION

WASHINGTON, DC 20202

January 7, 2026

The Honorable McKenzie Snow  
Director  
Iowa Department of Education  
400 East 14th Street  
Des Moines, IA 50319

Dear Director Snow:

I am writing in response to the Iowa Department of Education's (IDOE's) request on September 22, 2025, for a waiver of certain requirements in the Elementary and Secondary Education Act of 1965, as amended (ESEA) to provide greater flexibility for the use of certain formula grant funds IDOE receives from the U.S. Department of Education (Department).

IDOE generally states that the waiver will allow IDOE to better support students, families, educators, schools, and communities by streamlining State-level processes, consolidating resources, and reducing administrative burdens so programs more effectively align with Iowa's statewide priorities, including improving student achievement. I also want to acknowledge the generally positive reactions of the public in Iowa for innovative reforms to improve student outcomes and your continued commitment to ensuring equal access for all learners.

Consolidation of State-Level Activities Funds

After carefully considering IDOE's request and having some productive discussions by phone, I am granting, pursuant to my authority under ESEA section 8401(b), a waiver of the limitation that the consolidation of State-level funds in ESEA section 8201(a) and (b) applies only to administrative funds. As a result, for the funds awarded to IDOE through Federal fiscal year (FFY) 2028, IDOE may consolidate State-level activities funds for the following programs:

- Title II, Part A of the ESEA (Supporting Effective Instruction).
- Title III, Part A of the ESEA (English Language Acquisition).
- Title IV, Part A of the ESEA (Student Support and Academic Enrichment).
- Title IV, Part B of the ESEA (21st Century Community Learning Centers).

Please note that if IDOE consolidates State-level funds, it must separately consolidate administrative funds from State-level activities funds in order to maintain a consistency with the statutory distinction. I have found that providing this additional flexibility for the State to best determine how to use its State-level funds will advance student academic achievement. IDOE is approved to consolidate State-level funds through the Department's FFY 2028 allocations. IDOE may consolidate all funds reserved at the State level for each of the programs listed above through FFY 2028 and use the funds for any allowable use in each of the included programs.

400 MARYLAND AVE., SW, WASHINGTON, DC 20202  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

As a reminder, under this expanded ESEA section 8201 authority, IDOE must still meet all programmatic requirements and responsibilities for each of the covered programs.

### Program-Specific Waivers

In addition, I am approving IDOE’s request for a waiver of the following provisions because I found that approving these waivers will advance student academic achievement by providing additional flexibility to IDOE’s subgrantees:

- Carryover limitation in ESEA section 1127(b) for FFY 2024 Title I, Part A funds (i.e., the Title I, Part A funds that became carryover funds on October 1, 2025): the requirement limits a State educational agency’s ability to grant to its local educational agencies (LEAs) a waiver of the 15 percent Title I, Part A carryover limitation in section 1127(a) more than once every three years. This waiver is granted only for FFY 2024.
- Limitation on the 30 percent maximum reservation for transition services in ESEA section 1418(a) for Title I, Part D funds. That is, IDOE’s Subpart 1 subgrantees may reserve 15 percent or more of funds to support transition services. This waiver is granted through FFY 2028.
- Spending limitation assurances in ESEA section 4106(e)(2)(C), (D), and (E) for Title IV, Part A funds. This waiver is granted only for FFY 2025.

IDOE is now approved for authority under the Education Flexibility Partnerships Act of 1999 (Ed-Flex) to grant waivers to its LEAs of ESEA sections 1127(b) and 4106(e)(2)(C-E) in subsequent fiscal years without seeking Department approval. Please see the Ed-Flex approval letter for more information.

### Next Steps

Within 60 calendar days of the receipt of this waiver approval, the Department requests that IDOE submit an ESEA consolidated State plan amendment with applicable descriptions on the use of State-level funds for the covered programs.

Additionally, during the period of this waiver, pursuant to ESEA section 8401(e), IDOE must submit an annual report by October 30 each year that includes the following information for the prior year:

- How the waiver has decreased administrative burden;
- How IDOE used consolidated State-level activities funds;
- How IDOE’s use of funds under the approved waiver differed from its uses of funds prior to the waiver being granted; and
- How use of the waiver has contributed to improving student academic achievement in Iowa.

Relatedly, IDOE expressed interest in reducing duplicative and burdensome reporting requirements so that LEAs in Iowa have more time to dedicate to improving academic achievement. While IDOE did not request to waive any statutory data collection or reporting requirements, the conversations between our staff have been informative and insightful regarding the data collection burden facing States and LEAs. The Department is committed to helping in

the identification and elimination of duplicative and unnecessary data collections. I look forward to continuing that discussion with IDOE, other State educational agencies, and LEAs.

As you noted in your submission, this is the first phase of Iowa's Unified Allocation Plan, which is a first-in-the-nation proposal to return education to the States by providing common-sense flexibility, within the letter of and while maintaining the spirit of Federal law, to improve student academic achievement. Through this waiver, we expect that IDOE will advance achievement by targeting investments in core priorities, ensuring access to high-quality instructional materials, strengthening instruction in literacy and mathematics, and directing resources to students with the greatest needs.

I look forward to continuing to work with you as you implement this waiver. If you have any questions about this waiver or need further assistance, please contact my staff at [OESE.Titlei-a@ed.gov](mailto:OESE.Titlei-a@ed.gov). Thank you for the work you are doing to support students in Iowa.

Sincerely,



Linda E. McMahon

cc: Jay Pennington  
Tina Wahlert