



CER Summary:

What We Know: US DOE Grants First ESEA Waiver to Iowa

Situated within the broader [efforts](#) to [Return Education to the States](#) and the openness to increased flexibility and innovation in the use of federal education funds, the U.S. Department of Education granted its first waiver to Iowa's Department of Education. Iowa [submitted](#) five primary requests to consolidate and modernize Elementary and Secondary Education Act (ESEA) funding and compliance structures.

USED partially [approved](#) one request, with modifications, allowing limited consolidation of certain state-level funds beginning in FY2028. The remaining requests were not approved. The approval letter also granted several additional ESEA flexibilities consistent with earlier federal guidance, including targeted waivers related to carryover limits, spending requirements, and expanded Ed-Flex authority.

Outlined below are Iowa's individual proposal requests, corresponding approval statuses, and relevant details:

Proposal Request 1: Consolidation of state administrative and state activities set aside funds.

- **Request:** Consolidate ~\$10.86M across all nine ESEA programs (Title I Parts A, B, C, D; Title II Part A; Title III Part A; Title IV Parts A, B; Title V) into a single fund for IDOE to invest in priorities like assessments, professional learning, and student supports.
- **Approval Status:** **Partially approved (with modifications)**
- **Details of Approval:** Approved for consolidation of state-level funds (both administrative and activities) for FFY 2028, but only across four programs: Title II Part A, Title III Part A, Title IV Parts A and B. Administrative funds must be consolidated separately from state activities funds to maintain statutory distinctions. Funds can be used for any allowable purposes under the included programs.

Proposal Request 2: Consolidation of school district formula and competitive funds.

- Request: Consolidate ~\$145.79M across all nine ESEA programs into a single fund per district/charter school, building on transferability flexibilities to enable locally managed investments in student achievement.
- Approval Status: **Not approved.**
- Details of Approval: No details provided

Proposal Request 3: Calculation and retention of equitable participation proportionate share for nonpublic schools.

- **Request:** Allow IDOE to calculate and retain shares for equitable services to nonpublic students/teachers via third-party providers, based on proportionality and consultations.
- **Approval Status:** **Not approved.**
- **Details of Approval:** No details provided

Proposal Request 4: Revised administrative interpretation for prioritizing schools (ESEA Section 1113).

- Request: Explore flexibilities to better prioritize schools in need via changes to "rank and serve" rules, enabling coherent district-wide investments.
- Approval Status: **Not approved.**
- Details of Approval: No details provided

Proposal Request 5: Modernized supplement, not supplant implementation (Titles II, III, IV).

- Description of Request: Update compliance tests for supplement, not supplant in Title II Part A, Title III Part A, and Title IV Parts A and B to allow more flexible, high-impact uses while ensuring intent.
- Approval Status: **Not approved.**
- Details of Approval: No details provided

The approval letter includes several waivers that align with broader ESEA flexibilities but were not among the five primary requests in the proposal. These appear to support related aspects of Iowa's Department of Education goals:

- Waiver of carryover limitation for FY 2024 Title I Part A funds, allowing more frequent waivers of the 15% carryover limit.
- Waiver of spending limitation for Title I Part D funds, allowing >30% reservation for transition services through FY 2028.
- Waiver of spending limitation assurances for Title IV Part A funds, for FY 2025 only.
- Ed-Flex authority to grant local waivers of certain ESEA sections without further USED approval.

No items were explicitly denied in the approval letter, but the lack of mention for several proposal elements implies they were not granted.