

January 28, 2025

Dear Administrator McMahon,

As the officials directly responsible for education in our states, we stand united in our commitment to providing a high-quality education for all students. We believe that the diverse needs of students, schools, and communities are best understood at the state and local levels. We support many of the priorities of this Administration, including empowering parents, expanding career and technical education, and providing more education choices for students. We stand ready to support you in your efforts to restore state and local control over education and we welcome the opportunity to meet with you to discuss our efforts and ideas for K-12 education and collaborate on solutions. To provide a few initial ideas, we urge the new administration to prioritize the following policies that trust and empower state educational agencies (SEAs) to shape education systems that meet the unique needs of their students.

Key K-12 Education Recommendations

1. Prioritize State Control of Education Funds

SEAs need flexibility to allocate federal education dollars in ways that align with their strategic priorities. By reducing federal constraints on funding streams, SEAs can more effectively address their unique challenges, such as rural school support, achievement gaps, and workforce alignment. When the Department of Education conducts oversight of federal education funds or designs requirements and priorities for competitive funding streams, we urge you to defer to the decision-making of state leaders. We are equipped with the expertise and insight necessary to implement policies that reflect the values and aspirations of our constituents and can define our own visions to ensure all students experience a world-class education.

2. Issue Guidance Aligned with Congressional Intent that Defers to State Law and Policy

In the past, the Department has used “Dear Colleague Letters” (DCL) to push SEAs to take actions aligned to the current Administration’s priorities and opinions rather than the plain language in federal statute. DCLs too often contradict state law and policy. Instead of providing guidance for state leaders, these letters can make it difficult for us to pursue our priorities because they are often treated as legally binding policy, even when they are not anchored in law. We ask that this new Administration only issue guidance and DCLs that are as follows:

- Directly aligned to language in federal statute and aligned with Congressional intent
- Deferential to state laws and policies so as not to force behavior change
- Clear that these documents are suggestions and not legally binding

3. Work with Congress to Amend ESEA to Consolidate Title Programs and Provide State, District and School Leaders More Flexibility

Current requirements in the Elementary and Secondary Education Act (ESEA) hamper a SEA's ability to deploy funds in ways aligned with state priorities and goals. There are more than ten Title formula programs in ESEA, each with different purposes, allowable uses of funds, allocation formulas and methodology, and reporting requirements. These constraints can make it difficult for state leaders to effectively use these funds in a way that will be best for students. The following changes to ESEA related to the allocation, use, and oversight of Title formula funds would maximize state and local control over education and lead to sustained and coordinated improvements.

- *Block Grant ESEA Title Formula Funds:*
 - Provide SEAs and school districts the option to combine all their Title formula funds to give maximum flexibility for SEAs and local areas to pursue education goals of their choosing.
- *Provide Authority for State Initiatives*
 - Allow SEAs to reserve a larger percentage of formula funds beyond the administrative set aside to fund innovative state-driven initiatives such as workforce readiness programs, technology integration and access, literacy interventions, etc. This would enable SEAs to integrate Title formula funding more seamlessly into broader state education plans, ensuring coherence with state priorities, rather than as a separate program.
 - SEAs would report outcomes tied to their chosen priorities.
- *Allow for Alternative Resource Allocation*
 - Create authority for SEAs to pilot alternative spending approaches for Title I in allocation to school districts, such as offering competitive or matching grants for innovative state-designed strategies that improve educational opportunities and student learning outcomes.
 - Grant SEAs the authority to create their own formulas for district allocations, provided they comply with overarching principles that support all students.
 - Allow SEAs and districts to work together to determine school-level funding allocations based on regional needs. This provides flexibility for innovations such as rural district investments or specific learning loss initiatives in areas of high poverty concentration.
 - Empower SEAs to define how districts allocate funds at the school level, particularly when education goals are not being met.

4. Utilize Waiver Authority

- ESEA grants authority for the Department of Education to issue waivers of certain federal requirements in specific circumstances when SEAs want to pursue new and innovative approaches to better serve students. As SEAs

present new ideas for various areas of ESEA, consider using waiver authority to allow us to pursue and test such approaches.

Conclusion

The transition to a new administration is an opportunity to reaffirm a shared commitment to student success and educational excellence. By prioritizing state leadership and flexibility, the Trump administration can unleash the full potential of America's schools and students. We know the Department must work with Congress to achieve many of these changes to ESEA but, in the meantime, please defer to state and local decision-making as much as possible in your actions. Consider waiver requests when states have innovative ideas. Most importantly, we want you to know that you can rely on us to work with you to accomplish these education goals set forth by the Trump administration. We stand ready to assist, whether it is developing ideas, drafting solutions, or taking those solutions back to our states to implement and make real change for students in America. We welcome the opportunity to meet with you and your staff to begin this dialogue.

Signed,

Kirsten Baesler
North Dakota – State Superintendent of Public Instruction

Deena Bishop
Alaska – Commissioner, Department of Education & Early Development

Debbie Critchfield
Idaho – State Superintendent of Public Instruction

Steve Dackin
Ohio – Director, Department of Education & Workforce

Megan Degenfelder
Wyoming – State Superintendent of Public Instruction

Manny Diaz, Jr.
Florida – Commissioner of Education

Sydnee Dickson
Utah – State Superintendent of Public Instruction

Lance Evans
Mississippi – State Superintendent of Education

Katie Jenner
Indiana – Secretary of Education

Jacob Oliva
Arkansas – Secretary of Education

McKenzie Snow
Iowa – Director, Department of Education

Ellen Weaver
South Carolina – State Superintendent of Education