

November 1, 2021

Dear Members of Congress,

On behalf of the undersigned organizations, representing superintendents across 8 states, we write in response to the federal fiscal year 2022 (FY22) LHHS appropriations proposal. We are very appreciative to see education highlighted as a priority investment, including funding increases for both Title IA and IDEA, foundational federal formula programs critical for supporting the education of historically disadvantaged students.

The Elementary and Secondary Education Act (ESEA), currently known as the Every Student Succeeds Act (ESSA) allows states to reserve some Title I funds to administer Title I programs. Once a state receives its respective share of the national allocation, the state can reserve up to one percent of that amount to administer Title I. If the state allocation is low enough such that the one percent set aside would be less than \$400,000, the state may reserve up to \$400,000. This \$400,000 maximum has not been increased since at least the mid 1990s, nor has it been adjusted for inflation.

In light of this reality, we know our respective state agencies asked for the increase in the maximum, for reasons we are familiar with and can understand. We appreciate that the Senate proposal provides this increase. It is imperative to note, however, that any increase in the state set aside comes at the direct expense of allocations to the local education agency (LEA) level. Given the continued impact of the pandemic and the enduring critical need of Title I dollars, the idea of increasing funding to states only makes sense when accompanied by an appropriate overall funding increase to ensure no decrease in funding at the local level.

Thank you for anticipating this reality and for proposing a Title I funding increase robust enough to not only support the adjustment in the state set-aside cap, but to also increase LEA funding levels. As the FY22 process continues to move forward, we ask you to ensure that any change to the state set aside be accompanied by enough of an overall funding increase to ensure that LEAs in impacted states do not face a cut. Should overall Title I funding levels not increase enough to support the shift of funding to state agencies, we are opposed to this policy change.

We welcome the chance to work with you and Congress on the rest of the FY22 appropriations process, and to ensure that any updates to the small state administrative reservations do not come at the expense of local allocations. Please direct any questions to Noelle Ellerson Ng ([nellerson@aasa.org](mailto:nellerson@aasa.org)).

Sincerely,

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