

April 13, 2017

Senator Thad Cochran  
Chair, Senate Appropriations Committee  
U.S. Senate  
Washington, DC 20510

Representative Rodney P. Frelinghuysen  
Chair, House Appropriations Committee  
U.S. House of Representatives  
Washington, DC 20515

Senator Patrick Leahy  
Ranking Member, Senate Appropriations Committee  
U.S. Senate  
Washington, DC 20510

Representative Nita Lowey  
Ranking Member, House Appropriations Committee  
U.S. House of Representatives  
Washington, DC 20515

Senator Roy Blunt  
Chair, Senate LHHS Appropriations Subcommittee  
U.S. Senate  
Washington, DC 20510

Representative Tom Cole  
Chair, House LHHS Appropriations Subcommittee  
U.S. House of Representatives  
Washington, DC 20515

Senator Patty Murray  
Ranking Member, Senate LHHS Appropriations  
SubCommittee  
U.S. Senate  
Washington, DC 20510

Representative Rosa DeLauro  
Ranking Member, House LHHS Appropriations  
SubCommittee  
U.S. House of Representatives  
Washington, DC 20515

Dear Committee Members,

On behalf of the undersigned organizations representing school districts, administrators, educators, school boards, and parents, we write to express our deep concern about the potential of real cuts to the Title I programs of our nation's public schools under the new Every Student Succeeds Act (ESSA). Without action by the Appropriations Committee, virtually every school district in the nation will unexpectedly find their local Title I allocation cut in school year 2017-18 just as they begin to implement the new law. The Education Department's proposed Title IA funding levels for federal fiscal year 2017 (FY17) along with the requested proviso language would merely mitigate the severity of these local Title I allocation cuts.

Title IA of the Elementary and Secondary Education Act (ESEA), currently known as the Every Student Succeeds Act (ESSA), is a critical source of federal funding support in schools across the nation. Title I dollars are allocated in an equitable manner, targeted to areas of greatest need and bolster state and local efforts to ensure that all students can succeed.

The Title IA FY17 budget proposal included \$450 million from the now-eliminated School Improvement Grant (SIG) program. ESSA consolidates SIG into Title I. SIG was funded at \$450 million in FY16, accounting for the full amount of the President's proposed increase. More succinctly, these dollars are already in schools, and proposal is merely shifting the funding from SIG to Title I.

We are deeply concerned that, for reasons outlined below, even with this amount the overall Title I Part A allocation is insufficient and will actually result in a projected cut of at least \$200 million at the local level<sup>1</sup>. The proposal does not reflect an actual increase in the full context of statutory changes in ESSA related to program consolidation, state set aside, and the hold harmless provision.

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<sup>1</sup> Congressional Research Service, February 2016 (Accessed: <http://blogs.edweek.org/edweek/campaign-k-12/Title%20I%20analysis.pdf>)

The effective cuts to school districts come from a change in state set aside for school improvement. ESSA raises the state set aside from four to seven percent for school improvement and removes the Title I state set-aside hold harmless requirement for FY17. Under No Child Left Behind, the hold harmless provision ensured that local level allocations would not be reduced as a result of the state school improvement set-aside. States had to ensure level funding for school districts before taking the set aside, and recent funding realities created a scenario where the money that remained available for the state set aside was below four percent. Increasing the set aside to seven percent, in coordination with lifting the hold harmless, will create a funding vacuum, whereby dollars flow first to the state and then to the local level. The fiscal pressure of meeting the increased set aside under ESSA and backfilling funds for states that were operating with less than a four percent set-aside will result in significant cuts to local Title I programs. The Education Department's Title I budget request at best would translate into a \$200 million shortfall for local level allocations and at worst a significantly greater shortfall.

Separate from and in addition to these changes, ESSA provides states with an optional three percent set-aside for 'direct student services'. For states exercising this set-aside provision, it would further reduce LEA Part A allocations by up to an additional \$450 million. We are aware that some states are considering exercising this set-aside, which would result in further cuts to the local level.

ESSA was a strongly bipartisan effort to reauthorize the federal flagship K12 education statute, and FY17 funding levels are the first opportunity Congress will have to ensure that the new law is successfully implemented. This includes supporting the Title IA program by ensuring it is funded at a level adequate enough to support statutory requirements without negatively impacting local level allocations. The success of ESSA, as a bill that returns significant responsibility and authority back to the state and local level, will rely on the success of state and local education agencies. State and local education agencies will invest effort and cost in implementing ESSA, and it is all but certain that local school districts will face cuts in Title I should they implement ESSA as written, at the funding levels as proposed.

We strongly urge Congress to fund Title IA at a level at least \$900 million above the proposed level, an amount that includes the rollover of the \$450 million from SIG as well as an aggregate increase to ensure local school districts do not take a cut should their state choose to exercise the additional three percent state set-aside. It is critically important that LEA allocations for school year 2017-18 do not leave school districts facing a cut in their Title I funding to implement the first year of ESSA.

Sincerely,

AASA, The School Superintendents Association  
American Federation of Teachers  
Association of Educational Service Agencies  
Association of School Business Officials International  
Council of Great City Schools  
National Association of Elementary School Principals  
National Association of Secondary School Principals  
National Education Association  
National PTA  
National Rural Education Advocacy Consortium  
National Rural Education Association  
National School Boards Association

Cc: Members of the Senate and House Appropriations Committees