

Because a spring 1995 deadline for plan submission and review would not permit full public discussion of how to achieve the maximum potential of consolidated planning, the Department intends to implement the IASA's consolidated plan provision in two stages. States choosing to submit a consolidated plan as the basis for its FY 1995 program funding will only have to prepare a first year "preliminary" plan. During the following year, these States would develop and submit a final, comprehensive, consolidated plan that will be the basis for program funding for FY 1996 and beyond. Each State that submits a consolidated plan under this process may choose among the programs that are eligible for inclusion under the Act. Submitting individual program applications for FY 1995 does not preclude a State from submitting a full comprehensive plan the following year.

The First Year Consolidated Plan. The preliminary consolidated plan for FY 1995 funding would describe—for programs that the State expects the final plan to cover—how the State will develop a specific and comprehensive plan to support the kinds of cross-program coordination, program integration and effective modes of service delivery that will better enable all children to achieve to challenging standards. This preliminary plan also would address certain program-by-program application requirements that the Secretary determines must be reviewed *before* FY 1995 grant awards are made. The Secretary intends to keep the number of these additional requirements that must be addressed in the preliminary plan to the minimum needed for basic accountability. The Secretary plans to announce these minimum-content requirements by mid-February, 1995.

State Planning Activities During the First Year. During the first year after the preliminary plan is approved, States would have the opportunity to continue their consolidated planning process. In doing so, States would be able, among other things, to: (1) engage in consolidated planning that is integrated with other broad-ranging and systemic efforts such as those under Goals 2000 and the School-to-Work Acts; and (2) request from the Department—as they can do at any time—waivers of program requirements that they may need to implement their consolidated plans effectively.

During this planning period, States also would be responsible for implementing the requirements of their individual programs whether or not those requirements were addressed in the preliminary consolidated plan.

The Final Consolidated Plan. On the basis of their comprehensive planning, States would develop and submit to the Secretary their final, comprehensive, consolidated plans. The Department soon will begin working with interested States and others to develop guidance on how consolidated State planning can support an integrated, Statewide service delivery system that promotes higher student achievement. These plans also might need to include some minimum program-specific information that will be determined by the Secretary in close

consultation with the field. Approval of this comprehensive plan—along with any waivers that may be needed to implement it—would be the basis on which funds for covered programs would be awarded for FY 1996 and beyond.

Questions and Answers

The following information tries to address significant questions about the Department's strategy for implementing the consolidated plan provisions in the IASA.

Q1. What programs may a State include in its consolidated plan?

(**Note:** The following answer contains both a limited number of minor clarifications to the list of programs that the statute specifically identifies for possible inclusion in a consolidated State plan, and those additional programs that the Secretary is proposing to designate for possible inclusion in the plan. These clarifications and additions, which are reflected in the foregoing notice, were made after release of the guidance document.)

A1. ESEA programs may include: Title I, Part A (LEA Program); Title I, Part B (Even Start); Title I, Part C (Migrant Education); Title I, Part D (Neglected, Delinquent, or At-Risk Children); Title II (State and local programs) (Professional Development); Title III, Part A, subpart 2 (Technology for Education); Title IV, Part A (other than the Governor's Programs in section 4114) (Safe and Drug-Free Schools and Communities); and Title VI (Innovative Education Program Strategies (formerly Chapter 2)). A State also may include the following non-ESEA programs: State leadership programs under Title II of the Carl D. Perkins Vocational and Applied Technology Education Act; Programs under the Goals 2000: Educate America Act; and Programs under the School-to-Work Opportunities Act. (See section 14302, and the definition of "covered program" in section 14101 of the ESEA.)

The IASA authorizes the Secretary to designate other programs that may be included as well. The Secretary proposes to designate Subtitle B of Title VII of the Stewart B. McKinney Homeless Assistance Act (the Education for Homeless Children and Youth program) (enacted in Title III, Part B of the IASA), and all other State formula grant programs under the Perkins Act. The Secretary plans to provide a final list of designated programs by mid-February.

Q2. Will States that submit a consolidated plan to the Department have the option of choosing which among these programs to include?

A2. Yes, selection of programs to include in a consolidated plan, like the decision to submit a consolidated plan at all, is entirely at the discretion of the State.

Q3. Will a State have to submit any other funding application for programs that are included in its consolidated plan?

A3. No. For programs that a State includes in its consolidated plan, that plan will substitute for any application requirements that are contained in the individual program statutes.

Q4. Since the ESEA authorizes the Secretary to approve many individual

program applications for the duration of the Act, why would review and approval of the consolidated plan be performed in two stages?

A4. Section 14301 of the ESEA, unlike many of the application requirements for individual programs, does not require the Secretary to approve a consolidated plan for any particular period of time. Rather, it gives the Secretary broad authority to "establish procedures and criteria" that will govern the process for submitting the consolidated plan. The Secretary believes that a two-stage process, with submission of an initial plan in the spring of calendar year 1995, followed later by submission of a more comprehensive plan, is the best and most practical way to promote the broad and critical thinking at all levels that is needed to develop a strong consolidated plan.

Q5. Could funds awarded under a consolidated plan be co-mingled and treated as if they were from one funding source?

A5. No, unless the State receives a waiver of existing requirements that govern the way it accounts for funds—perhaps as part of the State's overall reform strategy under Goals 2000. Otherwise, while the Secretary's approval of a consolidated plan permits the Department to award funds under each program that the plan covers, it does not change the existing responsibility of States to account for those funds separately.

Q6. Would the Secretary's approval of a consolidated plan in any way change the basic purposes or beneficiaries of programs that the plan covers?

A6. No.

Q7. For those programs that a State includes in its consolidated plan, would the State be expected to address any application requirements that are contained in individual program statutes?

A7. Yes. In order to administer programs properly, a State's consolidated plan also would need to address certain application requirements under individual program statutes that the Secretary determines must be reviewed *before* program grant awards are made.

Q8. If program application requirements are not addressed in the consolidated plan, do these requirements still have to be met?

A8. Yes. Unless a State receives a waiver of a requirement under the applicable authority in the IASA, Goals 2000, or School-to-Work Acts, the Secretary's approval of a consolidated plan eliminates the need to provide further application information, but does not affect the State's responsibility to meet requirements identified in program statutes.

Q9. Can a State that already has an approved plan under Goals 2000 use the plan as the basis of its IASA consolidated plan?

A9. Yes. In fact, the Department would encourage it to do so.

Q10. Will there be discussion with the public about the specific content and program-by-program information required to be included in the consolidated plan?

A10. Yes. Section 14302(b) of the Act requires the Secretary to collaborate with SEAs, and, as appropriate, with other State agencies, LEAs, public and nonprofit organizations and institutions, private