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General Accounting Office
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Health, Education and Human Services Division
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February 16, 1999

The Honorable Richard W. Riley
The Secretary of Education

Subject: Consolidated Education Planning: State Education Agencies'
Implementation of Consolidated Planning at the Local Level

Dear Mr. Secretary:

The Congress and the Department of Education have undertaken several initiatives to provide states and local school districts with greater flexibility. One such effort—the consolidated planning process—allows states and local school districts to submit a single consolidated plan or funding application that covers several federal programs rather than submitting separate documents for each program. Supporters of consolidated planning contend that it can encourage educators and administrators to think carefully about how federal programs can fit together to support a school district's efforts to improve teaching and learning. However, in our work on the impact of federal requirements on local school districts, we obtained information that suggests that some state education agencies may not fully understand federal legislation related to consolidated planning.¹ Specifically, this letter describes how some states may not be fully implementing the provisions of federal law that allow local school districts to submit consolidated plans.

In summary, under the 1994 Improving America's Schools Act, local school districts may submit a consolidated plan to the state when applying for funding from more than one of several major education programs. However, although this federal law explicitly provides this option to school districts, some states may be denying their school districts the opportunity to use consolidated planning. In our survey of the 50 state education agencies, 7 states reported that they require school districts to submit separate plans for all the programs covered under the law. Consequently, local school districts in these states may be unable to take advantage of the increased program coordination and administrative savings that consolidated planning can provide. Although we

¹Elementary and Secondary Education: Flexibility Initiatives Do Not Address Districts' Key Concerns About Federal Requirements (GAO/HEHS-98-232, Sept. 30, 1998).

recognize that the Department has provided guidance to the states on this topic, the Department may wish to consider increasing its technical assistance efforts in this area.

BACKGROUND

To obtain funding for certain federal programs, school districts must submit plans (sometimes also called funding applications) to the state or federal government. These plans generally contain information on how the program funds will be used, certifications that federally prescribed procedures will be followed, and assurances that federal funds will be spent in accordance with the purpose of the program. However, district officials and education experts have expressed concern that the fragmented nature of the planning process not only is unnecessarily resource-intensive but also may impede program coordination. In recent years, the Congress and the Department have attempted to improve the planning and application process for federal programs. As a result, for some federal programs, local school districts are now able to submit a single consolidated plan to receive funding from several related programs rather than being required to submit separate documents for each one.

The Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Improving America's Schools Act of 1994, allows a local school district that applies to the state for funds under more than one of several major federal education programs to combine its program plans into a single consolidated plan. These covered programs include (1) title I, part A, of ESEA, which provides funding to help local school districts give additional assistance to disadvantaged children; (2) title I, part C, of ESEA, which provides funds to help local school districts educate migrant children; (3) title II of ESEA, the Eisenhower Professional Development Program, which provides funding to local school districts to provide teacher training and professional development; (4) title III, part A, of ESEA, the Technology for Education program, which provides funds for purchasing information technology; (5) title IV, part A, of ESEA, the Safe and Drug Free Schools and Communities Program, which provides funding for programs to prevent violence and substance abuse; and (6) title VI of ESEA, Innovative Education Program Strategies, which provides funding to help school districts develop innovative programs in several areas, including adult education and family literacy.

Under ESEA, states may require school districts to submit consolidated plans but cannot require them to submit separate plans for each of these covered programs. Districts may also be required to include, or have the option of including, additional programs in their consolidated plan, at the discretion of

the state education agency. For example, some states require districts to combine their plans for ESEA programs with their Goals 2000 plan, and some states allow districts to include the Perkins Act vocational education programs in their consolidated plan.

SOME STATES MAY NOT ALLOW
DISTRICTS TO TAKE ADVANTAGE OF
CONSOLIDATED PLANNING

Although federal law gives local school districts the option of submitting consolidated plans, some states may not be implementing this provision; as a result, local districts may be denied the opportunity to use consolidated planning. To gather data for our report on the impact of federal requirements on school districts, we conducted a survey of officials in all 50 state education agencies.² Most states reported that they either required school districts to submit consolidated plans or provided the districts with the option of submitting a consolidated plan when applying for federal education funds. However, seven states reported that they require school districts to submit separate plans for all covered federal programs. A total of 10 states reported that they require districts to submit separate plans for at least one of the covered programs. As a result, the school districts in these states may be unable to take advantage of the increased program coordination and decreased paperwork requirements that consolidated planning can provide.

This situation may reflect states' and school districts' difficulties with obtaining complete and current information on federal requirements. The number and complexity of federal requirements, combined with challenges posed by staff turnover, make keeping up with federal requirements a challenge for both state and district staff. To provide information about the law, the Department has issued guidance to the states on consolidated planning; however, some state officials may not have obtained or used this information. The Department's guidance, which was distributed to all 50 states and posted on the Department's Web site, provides clear, explicit information on local school districts' option to use consolidated planning. Nonetheless, our survey results showed that officials in at least 10 of the 50 states apparently do not understand their obligation to allow districts to take advantage of the

²This survey was conducted in July 1998, and all 50 states responded. However, we did not independently verify the information provided in response to the survey. For more information about the survey and about districts' reaction to consolidated planning, see GAO/HEHS-98-232.

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consolidated planning option. The Department's efforts to promote and encourage consolidated planning are therefore unlikely to be fully successful.

Under these circumstances, the Department may want to consider expanding its efforts to fully inform state and local officials that local school districts should be given the opportunity to do consolidated planning. Additional steps the Department might consider could include reissuing guidance, sending additional materials to the states, emphasizing consolidated planning in Department-sponsored conferences, and holding discussions of districts' consolidated planning options during technical assistance and oversight visits to state education agencies.

AGENCY COMMENTS

We provided a copy of this correspondence to the Department of Education for its review and comment. In its comments, the Department stated that it appreciates our recognition of its efforts to provide technical assistance on consolidated planning. The Department also stated that it agrees with our suggestion that it consider expanding its technical assistance in this area. The Department stated that as part of this effort it will give careful consideration to sending additional materials, holding discussions of districts' consolidated planning options during technical assistance and oversight visits to state education agencies, enlisting the assistance of the Comprehensive Regional Assistance Centers, and convening a technical assistance meeting.

We are sending this correspondence to appropriate congressional committees and will make it available to others upon request. If you have any questions about this correspondence, please call me at (202) 512-7014. Major contributors include Harriet C. Ganson, Assistant Director, Sarah L. Glavin, and Arthur T. Merriam, Jr.

Sincerely yours,



Carlotta C. Joyner
Director, Education and
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