



Department of Education

Townsend Building
401 Federal Street Suite 2
Dover, Delaware 19901-3639
education.delaware.gov

Cynthia Marten
Secretary of Education
302-735-4000
302-739-4654 (fax)

Question and Answer Guidance (July 11, 2025) Trump Administration Withholding of Certain Federal Education Funds

Dear Colleagues,

On July 3, Governor Meyer, Speaker Brown, and I briefed more than 150 preK to postsecondary leaders on actions by the Trump Administration to withhold critical education funds from Delaware – and all states. As we committed during that call, I’m following up today with additional information to support you and your teams in navigating this challenge.

- Consistent with our commitments during the July 3 call, the Delaware Department of Education (DDOE) has provided every local educational agency (LEA) with a summary of any remaining prior year federal funding still available to support immediate needs. If you or any member of your team need support in utilizing these funds for school year 2025-26 activities, please reach out to your program officer.
- While we monitor the situation, we want to provide LEAs with initial written guidance that can support your local planning and decision making. See below for a frequently asked questions (FAQ) document that we’ll update as the situation evolves. The FAQ includes several questions around completion and submission of local Consolidated Grant Applications (CGA). I want to note that there is no perfect solution for CGA completion, and LEAs retain choice in working through their applications. However, in an effort to respect your time and balance a variety of factors, we offer a series of recommendations including a **staggered approach to CGA submission that would involve completing sections of the application for funds that are in-hand and pausing where funds are withheld**. My team is already planning system adjustments and technical assistance sessions to make this process as efficient as possible for you and your staff.

Thank you for your collaboration and flexibility as we navigate this challenge together,

Cindy Marten

General Information

1. **Question:** Exactly what funds are withheld?

Response: Please see below for a summary of the funds currently withheld by the Trump Administration.

FEDERAL FISCAL YEAR (FY) 2025 (STATE FY 2026) FEDERAL FUNDS BEING WITHHELD (as of July 8, 2025)

<u>Grant</u>	<u>Provides Critical Funding for...</u>	<u>Examples of Entities Funded</u>	<u>Estimated Amount of Withholding</u> <i>Source: Fiscal Year 2024-FY 2026 President's Budget State Tables for the U.S. Department of Education</i>
<i>Title I Part C – Education of Migratory Children</i>	State and local programming to promote educational stability for migrant students and families	Delaware Department of Education, local providers	\$595,508
<i>Title II-A – Supporting Effective Instruction</i>	Teacher and school leader professional development, initiatives to expand the educator workforce, and class size reduction	School districts, charter schools	\$10,835,611
<i>Title III-A – English Language Acquisition</i>	Programs and practices to help English learners achieve proficiency	School districts, charter schools	\$2,028,751
<i>Title IV-A – Student Support and Academic Achievement</i>	Well-rounded education, effective use of educational technology, and safe and healthy schools	School districts, charter schools	\$6,693,000
<i>Title IV-B - 21st Century Community Learning Centers</i>	Academic enrichment opportunities during non-school hours	School districts, charter schools, community-based organizations	\$6,515,398
<i>Adult Basic Education – Integrated English Literacy and Civics Education</i>	Programs to help adult learners achieve English language proficiency, earn a GED, and prepare for a career	School districts, community-based organizations, postsecondary institutions	\$1,950,302

2. **Question:** The withheld funds are referenced as “fiscal year 2025,” but we’re in fiscal year (FY) 2026; which is it?

Response: Historically, federal education formula funds are forward funded, beginning in July. In this instance, when the federal government refers to “FY 2025,” it reflects the continuing resolution (budget) adopted in March 2025 and funding intended to support the 2025-26 school year, during Delaware’s FY 2026.

3. **Question:** Will the withholding impact nonpublic schools?

Response: Yes. While most formula funds flow from state educational agencies (SEAs) to LEAs, nonpublic schools (including private and religious schools) can derive services from a portion of these funds – both SEA and LEA shares – to support the needs of their low-income students.

4. **Question:** What steps is Delaware taking to secure the withheld funds?

Response: Under Governor Meyer’s leadership, we’re taking an all-of-the-above approach: coordinating with our state’s congressional delegation, leveraging DDOE’s knowledge of federal funding to support other states, and working to identify the specific impacts that will come from additional delays in administering these funds.

5. **Question:** Our LEA is exploring short-term use of state and local funding to sustain key programs previously funded by the withheld funds. Does that raise Supplement Not Supplant risks?

Response: While LEAs should seek guidance from their own legal counsel, ED has previously advised that when federal funds are sequestered, using local funds to support federal program expenses will not raise a presumption of supplanting if federal funds are later made available.

6. **Question:** Can my LEA continue to spend any remaining prior year funds for the programs where funds are withheld?

Response: Yes, and we strongly encourage LEAs to do so. Any LEA with prior year balances received a summary of these funds on July 3, 2025. Please contact your program officer if you have specific questions about how to utilize these funds, including amendments to your subgrant agreement.

7. **Question:** What is the best way to stay abreast of developments?

Response: DDOE will update this FAQ as we learn additional information. If funds are still withheld by July 14, we will begin scheduling program-level (e.g., Title II-A, Title III-A) office hours to provide additional technical assistance.

Technical Guidance for eGrants End Users

8. Question: Will DDOE extend the deadline for submitting our FY 2026 CGA?

Response: The first CGA submission date is July 16, 2025. LEAs that need additional time may submit at the August 12, 2025, or September 19, 2025, submission windows.

9. Question: What are next steps for LEAs in completing the CGA?

Response: LEAs are encouraged to continue working on the Title I-A, CTE/Perkins, IDEA 611, IDEA 619, and State Curriculum/Professional Development sections of the CGA. Funding levels for these programs are not withheld, and allocations in eGrants for these programs are current and accurate. Submitting the CGA on or after July 16, as originally planned, will enable LEAs to recode expenses for all sections of the CGA back to the earliest date of submission. The ability to recode to the earliest submission date would include the sections of the CGA where funds are withheld should DDOE receive updated allocations.

10. Question: How should LEAs proceed with completing the sections of the CGA that are not withheld ?

Response: LEAs can complete the sections of the CGA that are not withheld as usual and are encouraged to follow the original due dates listed in the FY 26 CGA Calendar/Timeline. When the sections that are not withheld have been completed, DDOE recommends that LEAs submit the CGA for review. DDOE program managers will only review the following sections: Title I-A, CTE/Perkins, IDEA 611, IDEA 619, and State Curriculum/Professional Development. When these sections have been approved by DDOE, the Subaward Grant Notices (SANs) will be generated. DDOE Finance will load funds into FSF for these programs and LEAs will receive a notification from DDOE's Finance Team, indicating that these funds are available.

11. Question: How should LEAs proceed with completing the sections of the CGA where funds are withheld?

Response: For the moment, DDOE recommends that LEAs pause their work in the CGA for these sections. If work has been completed for any of these programs, that work will be preserved in the system. The allocations for these programs currently listed in eGrants reflect last year's amounts (i.e., Federal FY 24, State FY 25); if and when DDOE receives updated allocations for these programs, we will notify LEAs and provide specific instructions, along with a modified timeline, to enable your teams to complete these sections of the CGA and submit for approval.

When these sections have been approved by DDOE, SANs will be generated and the DDOE Finance Team will load funds into FSF for these programs. LEAs will receive a notification from DDOE Finance, indicating that the funds are available in FSF for these programs.

Programs currently withheld and managed in the CGA include Title II-A, Title III-MLL, Title III Imm, and Title IV-A.

12. Question: Are LEAs required to zero out the budgets and complete the compliance questions for programs where funds are withheld in order to submit the CGA?

Response: No, LEAs are not required to zero out the budgets and complete the compliance questions for programs where funds are withheld in order to submit the CGA. (The error messages that would normally prevent a CGA submission will be turned off on the back end of eGrants.)

13. Question: Are LEAs required to zero out the budgets and complete the compliance questions for programs that are not withheld in order to submit the CGA?

Response: Yes, LEAs are required to zero out the budgets and complete the compliance questions for programs that are not withheld in order to submit the CGA. Please do not submit the CGA until the sections of the CGA that are not in question have been completed in their entirety.

14. Question: What guidance is there for LEAs that wish to transfer all or part of Title II-A and/or Title IV-A allocations into Title I?

Response: DDOE recommends that LEAs defer any action to transfer funds into Title I-A at this time. We recommend that LEAs build Title I-A budgets with original Title I-A allocations only. If and when Title II-A and Title IV-A funds are allocated, DDOE will work with LEAs on transferring funds into Title I-A at that time. Detailed instructions and a modified timeline will be provided.

15. Question: If my LEA's Title I-A, CTE/Perkins, IDEA 611, IDEA 619, and State Curriculum/PD CGA sections are approved before allocations are updated for the other programs where funds are withheld, will my CGA appear as being approved in the eGrants system?

Response: A CGA in this state will not appear as being approved in the eGrants system; however, this "work around" will provide LEAs with access to the approved funding sources in FSF as early as possible. The CGA will remain in "Chief School Officer Approved" or "Program Manager Not Approved" status until further information is available.

16. Question: How should LEAs manage ESSA equitable services obligations for funding sources that are in question?

Response: ESSA equitable services pertain to Title I-A, Title II-A, Title III Imm, Title III MLL, and Title IV-A. There is no change to the equitable services protocols/timelines for Title I-A as this funding source is not withheld. For the other ESSA programs, LEAs should adhere to routine equitable services protocols; however, timelines will need to be adjusted. LEAs should advise participating private schools that funding for these four ESSA programs has been withheld and therefore additional meaningful consultation, signing of affirmation of consultation forms, etc. will occur later than usual, presuming funds are ultimately released. (In the event that no funds are released for the programs that are withheld, there will be no FY 26 equitable share for private schools for these programs.)

17. Question: Will DDOE provide technical assistance regarding the eGrants guidance contained in this document?

Response: Yes, DDOE will offer an LEA eGrants Technical Assistance session on **Tuesday, July 15 from 11:30-1:00 via Microsoft Teams:**

[Join the meeting now](#)

Meeting ID: 252 106 213 700 6

Passcode: 3Hs3Pz2b