

United States Department of Education
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 9, 2026

Dear Colleague:

The Trump Administration’s goal is to improve academic achievement and student outcomes through evidence-based literacy instruction, greater education choice, and returning education to the States. Innovative thinking both in and out of the classroom is key to this goal, including finding more effective and flexible ways to use federal funds so states, districts and schools can best serve students.

A one-size-fits-all approach to instruction across the Nation is not adequately supporting students in reaching their full potential. Over the last five years, families have increasingly shown desire for change in their children’s education – both in terms of available options and in delivery of instruction.

This letter primarily outlines existing areas of flexibility for State educational agencies (SEAs) and local educational agencies (LEAs) to use funds under Title II, Part A (Title II) of the Elementary and Secondary Education Act of 1965 (ESEA) to implement innovative teacher workforce strategies, like strategic staffing.

Title II provides funding to improve teaching and learning through educator and leadership support, but these funds are too often used in ways that are unaligned to what teachers and school leaders really want and need. The majority of Title II funding has gone to efforts that do not meaningfully improve teacher recruitment, training, placement, or compensation, and do not produce significant return on investment. Innovative models such as strategic staffing, however, offer greater opportunity for Title II to more effectively achieve the goals of the program funding.

Strategic staffing is a team-based approach to school staffing that replaces the traditional one-teacher, one-classroom model. Through this model, at least two professional educators share responsibility for a common roster of students during the same blocks of time in the school day. Teamed educators have differentiated roles and distributed expertise, allowing for flexible student grouping, more effective use of instructional time, and expanded career entry and advancement opportunities¹. Title II funds, which are provided by formula to all SEAs and most LEAs, can be an important resource for SEAs and LEAs when considering how to implement strategic staffing as a part of a school’s thoughtful design to improve student academic achievement. In this letter, we provide some illustrative examples of how Title II funds may support strategic staffing. While the letter mainly focuses on Title II, funds under Title I, Part A (Title I) of the ESEA may also be used to support strategic staffing.

I. Title II Overview

¹ 34 CFR Part 75 [Docket ID ED-2025-OS-0680] Proposed Priority and Definitions—Secretary's Supplemental Priority and Definitions on Meaningful Learning Opportunities AGENCY: U.S Department of Education.

Statutory Purpose and Allowable Uses

Title II funds are intended to improve teaching and learning by supporting educators and school leaders, including increasing the number of teachers, improving the quality and effectiveness of educators to improve student academic achievement, and providing students greater access to effective teachers, principals, and other school leaders (ESEA section 2001(1-4)).

LEAs have considerable discretion in how to use Title II funds to meet these goals, and strategic staffing opens flexible alternatives to traditional staffing models to improve teacher effectiveness and teacher retention and accelerate student achievement. For example, LEAs may use the funds to provide professional development and other supports — for both teachers and school leaders — that address the learning needs of all students, including activities focused on improving educator quality and effectiveness and increasing access to effective teachers, principals, and other school leaders (ESEA sections 2103(b)(2) and 2103(b)(3)(B)).

While the majority of Title II funds are distributed to LEAs, SEAs may reserve a portion of Title II funds for certain activities, including activities that can support statewide conditions for strategic staffing, such as educator pipelines, teacher leadership systems, and school leader development (ESEA section 2101(c)). The Department's [*Title II, Part A Non-Regulatory Guidance*](#) provides additional examples of allowable uses of Title II funds for State activities.

Professional Development

An important consideration in moving to a strategic staffing approach is how to provide high-quality, ongoing professional learning and create staffing structures that intentionally cultivate teacher pipelines. Title II can be an important resource for LEAs when designing and implementing strategic staffing, as professional development is a primary use of Title II funds. The ESEA includes a specific definition of “professional development” when it is funded by Title II, emphasizing that professional development must be sustained, intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities such as coaching, mentoring, and common planning time (ESEA section 8101(42)).

This definition is important for both program design and compliance. It helps ensure that Title II funds are used for activities that build educator capacity over time, rather than one-time or stand-alone events that may not meet the statutory definition.

Support for School Leaders

Implementing a strategic staffing model involves not just educators, but also principals and other instructional leaders. Many of the permitted uses of Title II funds can also be used for principals and other school leaders to design and launch strategic staffing models. The ESEA defines a “school leader” as a principal or other individual who is employed by a school, LEA, or other entity operating a school and who is responsible for daily instructional leadership and managerial operations within the school building (ESEA section 8101(44)). In addition, SEAs have the option of reserving a portion of funds (up to 3 percent of the funds for LEAs) to provide support specifically for principals and other school leaders, which could include professional development to design and implement strategic staffing (ESEA sections 2101(c)(1) and (3)).

For example, the LEA could use its Title II funds for professional development for principals and school leaders on how to accurately differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional development and personnel

decisions. When proposing to use Title II funds for leadership-focused activities as part of a strategic staffing approach, SEAs and LEAs should confirm that the intended participants and activities align with the statutory definition of a school leader.

II. Examples of Strategic Staffing Activities Supported by Title II

Strategic staffing may take different forms depending on local context and needs. Below is a non-exhaustive list of some ways that Title II funds may be used to support strategic staffing models. In addition to Title II, a Title I schoolwide program school, based on the results of its comprehensive needs assessment, may also include these activities in its schoolwide plan and use Title I funds (or consolidated funds) to support them (ESEA section 11114(b)). Similarly, an LEA may reserve Title I funds to support strategic staffing across its Title I schoolwide program schools (34 CFR § 200.77(f)).

Differentiated Roles and Compensation

Some LEAs use strategic staffing to create additional, instructionally focused responsibilities for effective educators, such as leading instructional teams, providing job-embedded coaching, or supporting implementation of evidence-based instructional practices. Title II funds may be used to support differential pay or incentive pay for teachers, principals, or other school leaders who take on such additional responsibilities, consistent with statutory requirements (ESEA section 2103(b)(3)(B)(ii)).

Induction and Mentoring for Novice Educators

Strategic staffing approaches often emphasize reducing attrition and strengthening instruction by providing structured supports for novice educators. Title II explicitly authorizes induction and mentoring activities (ESEA section 2103(b)(3)(B)(iv)). Well-designed systems may include trained coaches, structured coaching cycles, protected time for observation and feedback, and alignment to instructional priorities.

Educator Pipelines, Including Residencies, Apprenticeships and Grow Your Own Programs

An SEA may use Title II funds to revise its educator pipeline system to focus on strategic staffing models. The SEA can use Title II funds to establish or revise teacher residencies, Grow Your Own programs, and apprenticeships for teachers, lead teachers, and principals (ESEA section 2101(c)(4)(B)). This includes programs that establish, expand, or improve alternative routes for State certification of teachers (ESEA section 2101(c)(4)(B)(iv)). In addition, an SEA may use funds to assist LEAs in recruiting and retaining teachers who are effective in improving student achievement, which could include specialized instructional support personnel and paraprofessionals that provide additional time for effective teachers to focus on their instructional practice and greater opportunities for teachers to provide evidence-based professional development for their peers. (ESEA 2101(c)(4)(B)(v)).

Job-Embedded Professional Learning and Team-Based Collaboration

Strategic staffing often depends on teams of educators planning together, analyzing student data, and aligning instruction. Title II funds may be used to support job-embedded professional learning that meets the statutory definition of professional development, including coaching, mentoring, and common planning time, when implemented as part of a sustained strategy (ESEA section 8101(42)).

School Leader Development

Effective strategic staffing requires school leaders who can build and sustain instructional teams, allocate time for collaboration, and support continuous professional learning. Title II funds can be used to support leadership development activities consistent with the program's purposes in ESEA section 2001(2–4) and allowable LEA uses in sections 2103(b)(3)(B)(iii–v) and 2103(b)(3)(E), for individuals who meet the statutory definition of “school leader” in section 8101(44).

III. Evidence-Based Planning and Continuous Improvement

Strategic staffing is most likely to succeed when grounded in a strong needs assessment, supported by evidence, and implemented with ongoing evaluation. The ESEA defines “evidence-based” and includes multiple tiers of evidence, ranging from strong to demonstrating a rationale (section 8101(21)).

The Department's *Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments* provides practical direction on selecting evidence-based strategies, planning for implementation, and using evaluation results to improve outcomes over time. SEAs and LEAs are encouraged to clearly define intended outcomes, implementation expectations, and measures for monitoring progress and informing continuous improvement.

V. Conclusion

When considering whether and how to implement a strategic staffing model, the Department encourages SEAs and LEAs to consider annually how to leverage Title II funds to build a strong system that supports your educators and helps students reach their highest potential. To support strong implementation, SEAs and LEAs, if they are not already, may wish to:

1. Clearly define the needs and intended outcomes, including educator effectiveness and broad access to effective instruction goals (ESEA sections 2001(1-4) and 2103(b)(2)).
2. Select evidence-based strategies and documenting the rationale and implementation supports for those strategies (ESEA section 8101(21)(A)).
3. Design professional learning that meets the statutory definition of professional development (section 8101(42)).
4. Plan for sustainability beyond the initial funding period.

As SEAs and LEAs continue to navigate educator shortages, evolving instructional demands, and the need for sustainable educator pipelines, Title II funds (as well as Title I funds in schoolwide programs) provide a flexible resource that can support strategic staffing approaches and help the SEA and LEA achieve their goals of improved student academic achievement. For questions about Titles I and II, please contact the Department at oe.se.titlei-a@ed.gov and oe.se.titleii-a@ed.gov, respectively.

Sincerely,



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Assistant Secretary
Office of Elementary and Secondary Education