

Title I and IDEA as Complementary Federal Responses: Distinguishing Opportunity-Mediated and Opportunity-Independent Underachievement

Abstract

Title I and IDEA are complementary federal responses to different sources of low achievement: each addresses needs that the other does not fully address. Title I targets opportunity-mediated underachievement, or low achievement linked to limited educational opportunity, while IDEA addresses persistent learning needs for which educational opportunity is not the primary explanation. This commentary clarifies how current federal policy preserves these distinct roles and uses a simple framework and stylized simulation to show how assigning IDEA support on the basis of low achievement alone increasingly directs it toward the same opportunity-related needs already served by Title I.

Keywords: Title I; IDEA; special education; persistent underachievement; educational opportunity

Introduction

Recent proposals to restructure Title I and the Individuals with Disabilities Education Act (IDEA) have reopened questions about how federal education aid should be organized and whom it should serve. Project 2025 proposed phasing out federal Title I funding over ten years and converting most IDEA funding into block grants without federal conditions (Burke 2023, 325–326). House appropriators subsequently proposed reducing Title I funding by approximately one-quarter in their fiscal year 2026 spending bill, although that reduction was not enacted (Congressional Research Service 2026). These proposals make it timely to examine the distinct purposes of poverty-targeted and disability-based aid.

Advocates and scholars have also pushed for changes to the basis of IDEA eligibility (Ryan 2013; Jochim and Kurz 2025). A common theme in these critiques is that access to federal aid should be tied more directly to students' learning needs and depend less on distinctions among the causes of low academic performance. Questions about how to distinguish these causes also arise in response-to-intervention approaches, which use students' responses to instruction to inform disability identification (Fletcher and Vaughn 2009; Spencer et al. 2014). These eligibility questions connect to disputes about who should receive services and whether observed differences in service receipt indicate over- or under-identification of students with needs (Morgan et al. 2012; Author 2026a). In turn, these identification questions continue to influence federal policy. For example, in August 2025, the Department of Education proposed removing significant-disproportionality reporting from states' annual IDEA Part B applications, a change approved by the Office of Management and Budget in March 2026 (Office of Management and Budget 2026).

These ongoing debates provide an opportunity to clarify the distinct purposes of Title I and IDEA. We show that the two programs embody complementary definitions of educational need:

Title I targets poverty-linked deficits in educational opportunity, while IDEA's exclusionary criteria for specific learning disabilities identify learning needs for which those deficits are not the primary explanation. Though students may experience both forms of need and receive support under both programs, each program addresses a distinct reason for providing aid. Evaluating the distribution of that aid therefore requires assessing whether each program reaches students with the need it is designed to address.

Title I and IDEA are Complementary Policy Tools

Title I is organized around the premise that poverty-linked opportunity deficits depress achievement, so its theory of action is compensatory and seeks to strengthen the educational environments in which children learn (U.S. House of Representatives, Office of the Law Revision Counsel 2026). Federal support is justified because poverty-linked disadvantage constrains educational opportunity and, in turn, achievement. Title I therefore addresses educational need through the opportunity channel.

IDEA serves a different function. It is an individualized entitlement tied to a free appropriate public education (FAPE) and triggered when a student needs special education services by reason of disability (U.S. Department of Education 2026a). For the Specific Learning Disability (SLD) classification in particular, federal regulations exclude learning problems that are primarily the result of environmental, cultural, or economic disadvantage, and identification procedures require evidence about appropriate instruction and can include a child's response to scientific, research-based intervention (U.S. Department of Education 2026b,c,d,e). These provisions address persistent underachievement for which deficits in ordinary educational opportunity are not the primary explanation. Here, adequate opportunity means appropriate instruction and targeted supports delivered with sufficient intensity and monitoring to plausibly change achievement if inadequate opportunity were the primary constraint. Additional

advantages may continue to improve achievement, but those gains do not define the benchmark used to judge disability-related need.

Taken together, these provisions encode complementary definitions of educational need. Title I addresses poverty-linked opportunity constraints. IDEA's SLD provisions address persistent learning difficulty for which those constraints are not the primary explanation. The same child may experience both forms of need and therefore receive support under both statutes. What differs is the basis of assignment: each program provides an independent justification for aid. Once a student is eligible, IDEA's specially designed instruction and related services can themselves expand educational opportunity. Under this framework, each program targets a distinct need, even if the same student receives support under both policies.

Our central claim is that retaining both definitions gives each program an independent policy role. Two simplifying alternative assignment mechanisms may clarify the stakes. Under one, *poverty* itself is treated as the relevant basis for identifying educational need, and federal aid is allocated on the basis of poverty-linked disadvantage. Title I fits naturally within this framework, while disability-related learning needs among students outside the poverty-targeted group lose an independent justification for support. Under the second, *low achievement* itself is treated as the relevant basis for identifying need, so students who perform poorly become eligible for additional aid regardless of the source of their underachievement. This approach can reach students with either form of need, but it also pulls IDEA toward a Title I-like allocation pattern wherever poverty strongly predicts achievement. The two distinct definitions of need used by Title I and IDEA preserve a separate justification for disability-related support and poverty-linked opportunity deficits.

Modeling distinct sources of need and funding allocation

The preceding section developed the intuition for how Title I and IDEA address distinct sources of educational need. Here, we provide a brief formal treatment to clarify the simulation below and make the argument accessible to readers who may find a mathematical formulation useful.

IDEA's SLD provisions define need through persistent underachievement for which inadequate educational opportunity is not the primary explanation. The formal problem is therefore to distinguish achievement attributable to opportunity, assessed against an adequacy benchmark, from the achievement that remains unexplained once that benchmark has been met. Following this logic, we write:

$$A_i = f(O_i, 1\{O_i \geq \kappa\}) + \varepsilon_i$$

Here, A_i denotes achievement for student i , and O_i denotes educational opportunity relative to the adequacy benchmark, with higher values indicating stronger opportunity. The indicator $1\{O_i \geq \kappa\}$ equals one when opportunity reaches the adequacy threshold κ and zero otherwise. The function f represents the opportunity-related component of achievement; its form is left unspecified. The residual ε_i represents achievement remaining after opportunity-related explanations have been accounted for relative to that benchmark. Persistent low values of this residual define disability-related need within the framework.

This formulation gives federal aid two distinct targets. Title I targets O_i by strengthening educational opportunity in high-poverty settings. IDEA targets persistent low values of ε_i through an individualized entitlement to support. The residual definition gives disability-related need an independent justification: it concerns underachievement that the opportunity component does not explain.

Of course, the conceptual opportunity measure and residual achievement are not directly

observed in administrative data. In practice, Title I uses poverty-linked allocation formulas to target opportunity deficits, while IDEA's SLD evaluations use evidence about achievement, instruction, and response to intervention to assess whether learning difficulties are primarily attributable to inadequate opportunity. The simulation below helps us understand who benefits from federal aid when these different definitions of need guide allocation. It retains opportunity-based targeting for Title I and compares two IDEA assignment rules: low observed achievement and low achievement after adjustment for an available measure of opportunity.

Simulation illustration: IDEA-Title I complementarity under varied IDEA allocation rules

To illustrate the allocation question, we hold each program's total funding fixed and assign Title I first. IDEA is then allocated under two alternative rules. Under an achievement-based rule, IDEA is assigned to students with the lowest post-Title I performance. Under a residual-based rule, IDEA is assigned to students whose post-Title I performance is lowest after accounting for the available measure of opportunity. We compare the share of combined funding reaching opportunity-disadvantaged students and students with disabilities under each rule. Students may belong to both groups.

The simulation answers two questions. First, when opportunity strongly shapes achievement, does routing IDEA through low performance cause it to concentrate on the same students already served by Title I? Second, when socioeconomic status (SES) is used as an imperfect measure of opportunity, how does adjusting achievement for that measure change the share of funding reaching simulated students with disabilities? Additional design details appear in Appendix A.

Figure 1 shows how the two assignment rules distribute funding across the two sources of need. First, as opportunity disadvantage becomes a stronger predictor of achievement, an IDEA assignment rule that targets achievement directs more combined funding toward opportunity-disadvantaged students and less toward students with disabilities. In short, the more opportunity

affects achievement, IDEA and Title I converge under this allocation mechanism. Second, when opportunity is observed directly, residual-based assignment maintains a constant share of combined funding for students with disabilities. Conversely, when SES is an imperfect measure of opportunity, residual-based assignment reaches students with disabilities less effectively as the measure becomes less informative. This occurs because a less informative opportunity measure makes it harder for the residual rule to distinguish the sources of lower achievement. Nevertheless, residual-based assignment allocates a larger share of combined funding to students with disabilities than the achievement-based mechanism in every scenario when SES is used as an opportunity proxy.

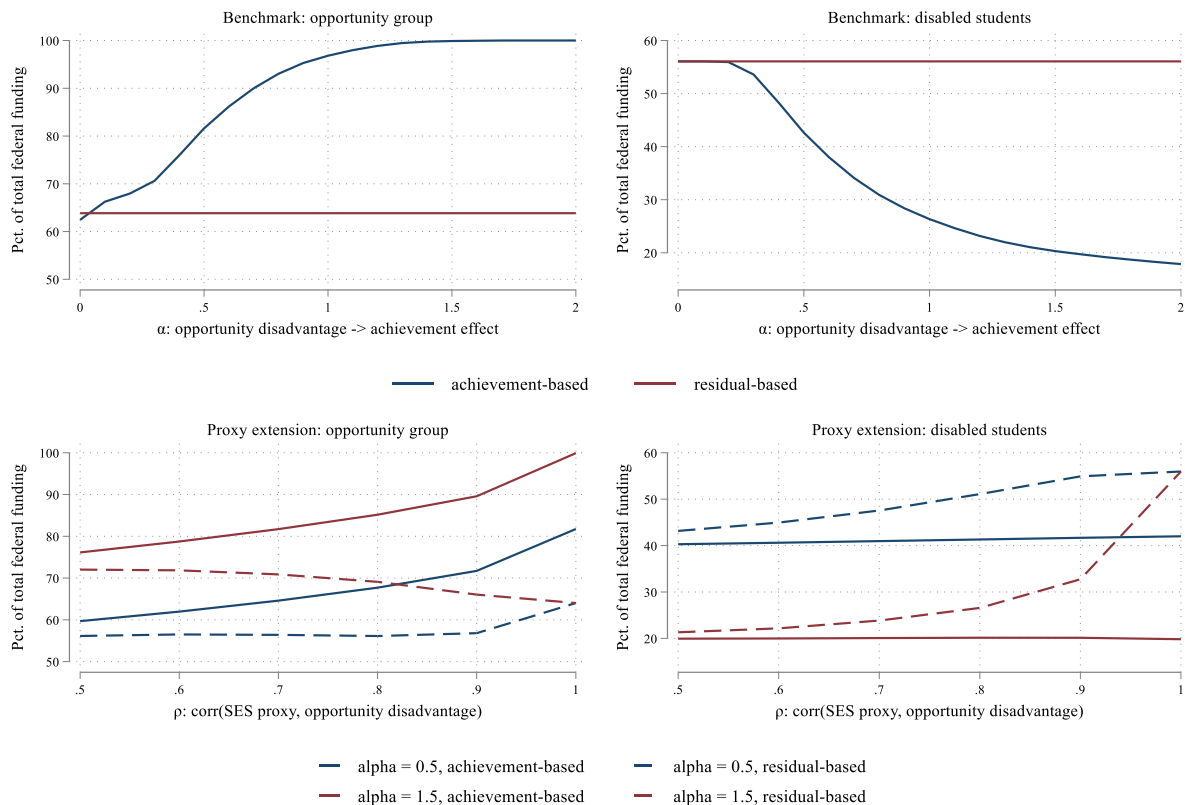


Figure 1: Alternative IDEA rules reshape the combined federal portfolio. Each panel shows the share of total federal funding (Title I plus IDEA) reaching the indicated group under two IDEA allocation rules, holding Title I and IDEA budgets fixed. The top row assumes policymakers observe opportunity directly and varies the opportunity-performance parameter α ; color denotes the IDEA rule. The bottom row assumes policymakers observe SES as a proxy for opportunity and varies the SES-opportunity correlation ρ ; color denotes α and line type denotes the IDEA rule. Under the simulation's assumptions, achievement-based assignment increasingly concentrates funding on opportunity-related needs as α rises, while residual-based assignment maintains a constant share reaching simulated students with disabilities in the observed-opportunity environment. Appendix A specifies the independent generation of disability and opportunity disadvantage.

Policy Implications

Title I and IDEA address different educational needs: poverty-linked constraints on opportunities to learn and disability-related learning difficulties. Students can experience both, so preserving access to both forms of support matters even when the programs serve the same children. Proposals to phase out federal Title I funding and remove federal conditions on IDEA grants make these purposes relevant to current decisions about federal aid (Burke 2023, 325–326). Our framework and simulation suggest four implications for those designing,

administering, and evaluating that aid.

1. Federal policymakers should preserve a separate basis for poverty-targeted and disability-based support. Title I directs resources toward educational opportunity in high-poverty settings, while IDEA provides an individualized entitlement to services by reason of disability (U.S. House of Representatives, Office of the Law Revision Counsel 2026; U.S. Department of Education 2026a). Neither poverty nor low achievement alone captures both definitions of need. Policymakers considering changes to funding formulas or eligibility should therefore assess whether students retain access to support for each need, including when they experience both.
2. Federal and state education agencies should explain how these definitions guide SLD identification. Guidance should specify how evaluators use evidence about appropriate instruction, targeted interventions, and persistent learning difficulty to judge whether inadequate opportunity is the primary explanation for underachievement (U.S. Department of Education 2026b,d,e). Our simulation study illustrates why the assignment rule matters: as opportunity becomes a stronger predictor of achievement, assigning IDEA support through low academic performance alone increasingly directs funding toward the opportunity-disadvantaged group already targeted by Title I.
3. Administrators and researchers should assess how well their measures capture the need being evaluated. SES provides incomplete information about poverty-linked opportunity, as students with similar SES may have experienced different instruction and supports. The simulation shows that less informative opportunity measures make residual-based assignment less effective at reaching students with disabilities. District administrators should therefore consider socioeconomic information alongside evidence about students' educational experiences. Researchers studying disproportionality should likewise

distinguish the conceptual definition of disability-related need from the residual obtained by adjusting achievement for a limited set of observed characteristics.

4. District and school leaders should continue to use intervention evidence to inform both support and evaluation. Multi-Tiered Systems of Support provide instruction and targeted interventions while documenting students' progress, and student improvement provides evidence that stronger educational opportunity can address a student's learning difficulties, whereas persistent difficulties motivate an individualized evaluation for special education (U.S. Department of Education 2026b,d,e). This evidence helps schools determine which supports a student needs, including when stronger general instruction and individualized disability-related services are both warranted.

Conclusion

Title I and IDEA embody complementary definitions of educational need. Title I addresses poverty-linked constraints on opportunity. IDEA's SLD provisions address persistent underachievement for which inadequate educational opportunity is not the primary explanation. These definitions give each program an independent justification while allowing both to support the same students.

Current proposals to restructure federal education aid should be evaluated against both purposes. Federal policymakers determine which needs receive a distinct basis for support; agencies translate those purposes into guidance; and schools use evidence about students' circumstances, instruction, and learning to make decisions. The simulation shows why those decisions matter: changing the basis of assignment changes who receives funding. Preserving both definitions of need helps keep assistance available for opportunity-related disadvantage and disability-related learning difficulties.

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Appendix A. Simulation design and parameterization

This appendix describes the simulation used in Figure 1. The purpose of the exercise is to compare how alternative IDEA allocation rules reshape a fixed combined federal portfolio once Title I has already operated. The simulation represents disability status as an independently generated input so that we can evaluate which students each rule reaches. Its disadvantage and noise variables use different notation from the conceptual opportunity measure and disability-related residual defined in the main text.

A.1 Setup

For each parameter configuration, we simulate a cohort of $N = 100,000$ students. We generate opportunity disadvantage, disability status, achievement noise, and proxy noise independently. This simplifying assumption allows the illustration to distinguish the two sources of underachievement and compare how assignment rules allocate support. Baseline achievement for student i is

$$Y_{0i} = -\alpha W_i - \beta D_i + u_i$$

Here $W_i \sim N(0,1)$ denotes latent opportunity disadvantage, $D_i \sim \text{Bernoulli}(0.12)$ denotes disability status, and $u_i \sim N(0, \sigma^2)$ captures other variation in achievement. Higher values of W_i indicate greater disadvantage. We hold $\beta = 1.0$ and $\sigma = 0.15$ fixed. Achievement is measured on a fixed reference scale; it is not standardized anew within each parameter configuration.

In the proxy-information environment, policymakers do not observe W_i directly. Instead, they observe an SES proxy

$$S_i = \rho W_i + \sqrt{1 - \rho^2} v_i$$

where $v_i \sim N(0,1)$. Higher values of S_i indicate greater socioeconomic disadvantage. Larger ρ implies that SES is a more informative proxy for opportunity.

A.2 Funding environment

We fix average budgets of \$1,000 per student for each program. All funding variables in the equations below are measured in dollars, so that

$$B^{T1} = N \times \$1,000 \text{ and } B^{IDEA} = N \times \$1,000.$$

Title I is assigned first. In the observed-opportunity environment, Title I targets the top 30 percent of the latent opportunity-disadvantage distribution. In the SES-proxy environment, it targets the top 30 percent of the observed SES-disadvantage distribution. Let Z_i denote the targeting signal, where $Z_i = W_i$ when opportunity is observed and $Z_i = S_i$ when policymakers rely on SES. If c_Z is the 70th percentile of Z_i and n_{T1} students satisfy $Z_i \geq c_Z$, then

$$F_i^{T1} = \frac{B^{T1}}{n_{T1}} 1\{Z_i \geq c_Z\}.$$

We allow Title I to affect the screening measure later seen by IDEA:

$$Y_{Ti} = Y_{0i} + \tau \frac{F_i^{T1}}{1,000}$$

where $\tau = 0.031$ gives the score increment per \$1,000 on the fixed reference scale. Each Title I recipient receives approximately \$3,333.33, giving an increment of about 0.1033. The Stata code stores funding in thousands of dollars and applies the equivalent coefficient directly. This calibration is illustrative; the simulation compares assignment rules rather than estimating either program's treatment effect.

A.3 Alternative IDEA rules

IDEA is allocated after the Title I step. Under the achievement-based rule, IDEA serves the bottom decile of the post-Title I performance distribution. If c_Y is the 10th percentile of Y_{Ti} and n_{IDEA}^{ach} students satisfy $Y_{Ti} < c_Y$, then

$$F_i^{IDEA,ach} = \frac{B^{IDEA}}{n_{IDEA}^{ach}} 1\{Y_{Ti} < c_Y\}.$$

Under the residual-based rule, IDEA serves the bottom decile of residual underachievement after accounting for the available opportunity signal. We estimate an ordinary least squares regression of post-Title I performance on an intercept and Z_i . The residual for student i is

$$R_i(Z) = Y_{Ti} - (\hat{a} + \hat{b}Z_i),$$

where $\hat{a}$ and $\hat{b}$ are the fitted intercept and slope. This is a linear projection; the regression does not separately include the indicator for Title I receipt.

If c_R is the 10th percentile of $R_i(Z)$ and n_{IDEA}^{res} students satisfy $R_i(Z) < c_R$, then

$$F_i^{IDEA,res} = \frac{B^{IDEA}}{n_{IDEA}^{res}} 1\{R_i(Z) < c_R\}.$$

The SES proxy matters differently across the two rules. Under the achievement-based rule, it matters indirectly through the earlier Title I allocation. Under the residual-based rule, it matters both through Title I and through the IDEA screen itself because the residualization uses the available proxy rather than true opportunity.

A.4 Outcomes

For IDEA rule $m \in \{ach, res\}$, total federal funding is

$$F_i^{tot,m} = F_i^{T1} + F_i^{IDEA,m}.$$

Let c_W denote the 70th percentile of the latent opportunity-disadvantage distribution. We report two allocation outcomes:

$$\Phi_W^{(m)} = \frac{\sum_i F_i^{tot,m} 1\{W_i \geq c_W\}}{\sum_i F_i^{tot,m}},$$

the share of the combined portfolio reaching the top 30 percent of latent opportunity disadvantage, and

$$\Phi_D^{(m)} = \frac{\sum_i F_i^{tot,m} 1\{D_i = 1\}}{\sum_i F_i^{tot,m}},$$

the share of the combined portfolio reaching disabled students. These are evaluation outcomes rather than eligibility definitions. The groups can overlap, so their funding shares need not sum to one.

A.5 Exercises shown in Figure 1

We implement two exercises. First, in the observed-opportunity environment, we set the policy signal equal to true opportunity and vary $\alpha = 0, 0.1, \dots, 2$. Second, in the SES-proxy environment, we replace W_i with S_i for policy targeting, vary $\rho = 0.5, 0.6, \dots, 1$, and plot results for $\alpha = 0.5$ and $\alpha = 1.5$. These exercises illustrate how assignment rules behave under the specified assumptions.

The replication uses Stata 17, the mt64 random-number generator, and seed 246810. The seed is reset for each configuration to hold the underlying draws fixed within each exercise. The observed-opportunity exercise draws opportunity disadvantage, disability, and achievement noise in that order. The proxy exercise additionally draws proxy noise after opportunity disadvantage and before disability, so it uses a different cohort even when the proxy perfectly measures opportunity. This convention preserves the numerical results shown in Figure 1.