Title I, A Neglected & Title I, D Subpart 2 Annual Count

Erin Yarbro Christian |

Non-Traditional Educational Programs Manager

Division of Federal Programs and Oversight |
Sept. 30, 2025

TN Department of Education

© Tennessee Department of Education

Session Objectives

- To provide an understanding of the purpose of the annual count
- To provide information on the annual count data collection process
- To aid in determining eligible facilities and students
- To provide important dates pertaining to the collection of the annual count

© Tennessee Department of Education

Agenda

- Purpose of the Annual Count
- Annual Count Process
- Counting
- Important Information
- Closing

© Tennessee Department of Education

Purpose of the Annual Count

TN Department of Education

© Tennessee Department of Education

Purpose of the Annual Count

- To accurately identify the number of eligible children and youth who are neglected and delinquent
  - U.S. Department of Education (ED) uses the data from the annual count to determine the funding that is provided to the state for Title I, Part A, Neglected and Title I, Part D, Subpart 2.

- To allocate funding to eligible programs and eligible children and youth with the greatest need
  - The Tennessee Department of Education (department) then awards subgrants to local educational agencies (LEAs) with children and youth in locally operated juvenile neglected and delinquent facilities.

© Tennessee Department of Education

Annual Count Process

TN Department of Education

© Tennessee Department of Education

Annual Count Process

Conduct the Count!

© Tennessee Department of Education

Annual Count Process

1. Determine Eligible LEAs:

- The LEA has children and youth living in locally operated institutions for children who are neglected or delinquent.
- The department determines which LEAs have institutions that may be eligible.

2. Determine Eligible Facilities:

- The facility meets the definition of an institution for children and youth who are neglected or delinquent to be eligible;
- The LEA (in collaboration with the department) determines which facilities are eligible.

© Tennessee Department of Education

Definitions

- An eligible neglected facility is a public or private residential facility, other than a foster home, that is operated primarily for the care of children and youth who have been committed to the institution or voluntarily placed in the institution under applicable state law **due to abandonment, neglect, or death of their parents or guardians.**
- An eligible delinquent facility is a public or private residential facility, other than a foster home, that is operated primarily for the care of children and youth who have been **adjudicated to be delinquent** or **in need of supervision**.

© Tennessee Department of Education

Definitions: Important Points

- A facility must designate if it is a neglected ***or*** delinquent facility; it ***cannot*** be both.
- Facility designations should be consistent from year to year.
- The facility's charter or license can help in determining the type of facility.

© Tennessee Department of Education

Definitions: Questions to Ask

- What does the facility's charter indicate is the purpose of the facility?
- How are students placed at the facility?
- Are they placed by the Department of Children's Services (DCS) or the courts for being neglected or delinquent?
- Are most children served neglected or delinquent?

© Tennessee Department of Education

Annual Count Process

3. Determine Eligible students:

- The student is between five and 17 years old.
- The student lived at the facility for at least one day during the 30-day count period.
- The facility (in collaboration with the LEA and/or the department) identifies eligible students.

© Tennessee Department of Education

Eligibility of Students in a Group Home

- NEP managers sought specific guidance from ED after annual count eligibility information was presented at the 2020 NDTAC Title I, Part D State Coordinators Virtual Conference.

- We posed this question to ED for clarification:
  - *"If a student is in a group home, attending public school, and is also listed as a foster care student, would the group home be considered an eligible facility, and would the students be eligible for the annual count?"*

© Tennessee Department of Education

Eligibility of Students in a Group Home

- The response:
  - "The answer is no; the Tennessee Department of Children's Services (TDCS) is reporting the student as a foster student in the U.S. Department of Health and Human Services (HHS) annual collection of October foster count data through ACF form 4125. As stated above, the definition of an N or D facility excludes foster children, presumably because they are counted in the Title I, Part A formulas separately from N (Neglected) children."

© Tennessee Department of Education

Eligibility of Students Placed by Parent/Guardian

- NEP managers sought specific guidance from ED after annual count eligibility information was presented at the 2020 NDTAC Title I, Part D State Coordinators Virtual Conference.

- We also posed this question to ED for clarification:
  - *If students are placed by their parents in a psychiatric residential treatment center, can they be counted in the annual count for Title I, Part A—Neglected?*

© Tennessee Department of Education

Eligibility of Students Placed by Parents or Insurance

- The response:
  - "Yes. If a treatment center meets the definition in ESEA § 1432(4) of an institution for neglected children and youth, all students who reside in the facility would be reported in the local annual count as N students, including students voluntarily placed in the facility by their parents. In addition, with respect to services, ESEA § 1113(c)(3)(ii) requires a local educational agency (LEA) for which a local N count was reported to reserve sufficient Title I, Part A funds to 'serve children in local institutions for neglected children.' Thus, all students in a facility that meets the definition of an institution for neglected children and youth in ESEA § 1432(4) must receive Title I, Part A services from the LEA."

© Tennessee Department of Education

Facility Designation

- Facilities are ***required*** to provide supporting documentation to support their statement.
  - Examples of documentation include a copy of the charter, mission statement, licensure, literature about the program, etc.

- All facilities are ***required*** to provide a description detailing how they meet the definition of neglected or delinquent.
  - Both definitions are available in this presentation and in the submission link.

- An upload field will be available for documentation supporting the description in the submission instrument.

© Tennessee Department of Education

Counting

TN Department of Education

© Tennessee Department of Education

Count Window

- The department has set the count window for LEAs and facilities, which is the time frame that must be reported on for the annual count.
- No students should be included in the annual count outside of this date window.

Oct. 1 – Oct. 30

© Tennessee Department of Education

Counting

- Any eligible student who resides in the facility for at least one day during the 30-day count window should be counted.
- This is a ***duplicated*** count, which means that if students exit and re-enter during the window, they are counted ***twice.***
- All students are counted for each facility regardless of student designation (i.e., neglected or delinquent).

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a neglected institution should be counted?

Sun.	Mon.	Tue.	Wed.	Thu.	Fri.	Sat.
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe	Joe	Joe	Joe	Joe	Joe	Joe
Joe	Joe					

- **Joe and Kelly are considered neglected, and Shawn is considered delinquent.**

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a neglected institution should be counted?

Sun.	Mon.	Tue.	Wed.	Thu.	Fri.	Sat.
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe	Joe	Joe	Joe	Joe	Joe	Joe
Joe	Joe	**Neglected Child Count = 3**				

- **Joe and Kelly are considered neglected, and Shawn is considered delinquent.**

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a delinquent institution should be counted?

Sun.	Mon.	Tue.	Wed.	Thu.	Fri.	Sat.
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe	Joe	Joe	Joe	Joe	Joe	Joe
Joe Shawn	Joe Shawn					

- **Joe and Kelly are considered neglected, and Shawn is considered delinquent.**

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a delinquent institution should be counted?

Sun.	Mon.	Tue.	Wed.	Thu.	Fri.	Sat.
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly Shawn
Joe Kelly Shawn	Joe Kelly Shawn	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly	Joe Kelly
Joe	Joe	Joe	Joe	Joe	Joe	Joe
Joe Shawn	Joe Shawn	**Delinquent Child Count = 4**				

- **Joe and Kelly are considered neglected, and Shawn is considered delinquent.**

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a neglect institution should an LEA count?

Neglect Institution 1	Neglect Institution 2	Delinquent Institution 1	Delinquent Institution 2
• 10 students who are neglected • 10 students who are delinquent	• 20 students who are neglected	• 40 students who are delinquent	• 10 students who are neglected • 10 students who are delinquent

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a neglect institution should an LEA count?

Neglect Institution 1	Neglect Institution 2	Delinquent Institution 1	Delinquent Institution 2
• 10 students who are neglected • 10 students who are delinquent	• 20 students who are neglected	• 40 students who are delinquent	• 10 students who are neglected • 10 students who are delinquent

Neglected Institution Child Count = 40

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a delinquent institution should an LEA count?

Neglect Institution 1	Neglect Institution 2	Delinquent Institution 1	Delinquent Institution 2
• 10 students who are neglected • 10 students who are delinquent	• 20 students who are neglected	• 40 students who are delinquent	• 10 students who are neglected • 10 students who are delinquent

© Tennessee Department of Education

Counting: How do I determine my number?

- How many students who reside in a facility that is designated as a delinquent institution should an LEA count?

Neglect Institution 1	Neglect Institution 2	Delinquent Institution 1	Delinquent Institution 2
• 10 students who are neglected • 10 students who are delinquent	• 20 students who are neglected	• 40 students who are delinquent	• 10 students who are neglected • 10 students who are delinquent

Delinquent Institution Child Count = 60

© Tennessee Department of Education

Important Information

Department of Education

© Tennessee Department of Education

Important Information

- Count window: **Oct. 1 – Oct. 30**
- The NEP team embedded the submission of the annual count data into ePlan.
- Additional information on the submission of the annual count data is available in the Annual Count Technical Guide, which will be posted in late October.
  - Facilities will submit the count to the LEA for review, and the LEA will submit the count via ePlan to the department.
- **All counts are due to the department by COB on Nov. 4.**

© Tennessee Department of Education

Questions?

© Tennessee Department of Education

Contact Information

Erin Yarbro Christian | Title I, Part D Subpart 1 Manager and Count Data Coordinator
Erin.Christian@tn.gov
(901) 504-9627

Jackie Jacobson | Title I, Part A Neglected and Title I, Part D Subpart 2 Manager
Jackie.Jacobson@tn.gov
(615) 390-4549

Leslie Watson | Alternative Education and NEP Manager
Leslie.Watson@tn.gov
(615) 390-4549

© Tennessee Department of Education

Thank You!

Permission is granted to use and copy these materials for non-commercial educational purposes with attribution credit to the "Tennessee Department of Education". If you wish to use the materials for reasons other than non-commercial educational purposes, please contact the office of general counsel at (615) 741-2921.

TN Department of Education

© Tennessee Department of Education

Fraud, Waste or Abuse

Citizens and agencies are encouraged to report fraud, waste, or abuse in State and Local government.

NOTICE: This agency is a recipient of taxpayer funding. If you observe an agency director or employee engaging in any activity which you consider to be illegal, improper or wasteful, please call the state Comptroller's toll-free Hotline:

1-800-232-5454

Notifications can also be submitted electronically at:

http://www.comptroller.tn.gov/hotline

TN Department of Education

© Tennessee Department of Education

Please Share your Feedback:

You may access the PD Survey by navigating here:
https://forms.office.com/r/eVtWEAZ9xZ

Department of Education

© Tennessee Department of Education