



Title I-D

DATE: December 10, 2025

TO: Superintendents, Federal Programs Coordinators, and Title I-D Coordinators – **Non-Charter LEAs ONLY**

SUBJECT: ACTION REQUIRED: FY26 Title I-D LEA Annual Count Locally-Operated Institution Lists & Guidance

Dear Colleagues,

As required by the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA) in 2015, all local education agencies (LEAs) must report reliable, valid, and comprehensive annual counts of eligible children and youth in eligible locally-operated neglected and delinquent institutions and adult correctional institutions within their boundaries (20 U.S.C. § 6422(b); 20 U.S.C. § 6333(c)(4)(B)).

All public school districts, regardless of Title I-D subgrant status, are required to complete the Title I-D LEA Annual Count.

Purpose of Annual Count: The U.S. Department of Education utilizes these counts to calculate LEAs' Title I-A allocations and the State's Title I-D, Subpart II allocation to be subgranted to LEAs. The Arizona Title I-D Program utilizes the annual count to inform statewide programmatic decisions and support to State agencies and local education agencies.

Funding Implications for LEAs: Each LEA's Title I-D Annual Count impacts both individual LEA and Statewide funding.

- **Title I-D, LEA Neglected Counts:** The counts of children and youth residing in locally-operated neglected institutions determine the individual Title I-A funding allocations for LEAs with such facilities within their boundaries.
 - **Title I-A Neglected Set-Aside Requirement:** LEAs with locally-operated institutions for children and youth who are neglected within their boundaries are required to reserve sufficient Title I-A funds to provide comparable supplementary academic and support services to the students residing in such institutions (20 U.S.C. § 6313(c)(3)(A)(iii); 34 C.F.R. § 200.77(a)(3)).
- **Title I-D, LEA Delinquent Counts:** The counts of children and youth residing in locally-operated delinquent institutions and adult correctional facilities are used to determine the State's Title I-D, Subpart II allocation (20 U.S.C. § 6422(b)). These funds are then subgranted to eligible LEAs with high numbers or percentages of children and youth residing in locally-operated delinquent institutions and adult correctional facilities within their boundaries.
 - The Arizona Title I-D Program notifies LEAs of their eligibility to apply for Title I-D, Subpart II funds.

Tom Horne, Superintendent of Public Instruction

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Identification of Eligible Locally-Operated Institutions: All LEAs are required to identify, verify, and submit the number of eligible children and youth in eligible locally-operated neglected and delinquent institutions, and adult correctional facilities within their boundaries.

The resources provided below serve as a starting point for identifying locally-operated institutions. Please note that these lists are not comprehensive of all locally-operated institutions and may include ineligible facilities.

- **Department of Child Safety (DCS)**
 - [List of Group Homes & Qualified Residential Treatment Programs \(QRTPs\)](#)
 - [List of Division of Development Disabilities Group Homes](#)
- **Department of Health Services**
 - [AZ Care Check](#)
- **Remaining Locally-Operated Facilities:** Conduct internet searches to locate all other neglected, delinquent, and adult correctional institutions within your LEA's boundaries, including those that are privately run or located on Tribal land.
- **Resource:** Utilize the checklists included in the [Title I-D LEA Annual Count Eligibility Guidance](#) to assist with the determination of whether a locally-operated neglected or delinquent institution, or adult correctional facility should be included in the LEA's annual count.

Non-Responsive Institutions: LEAs must make a minimum of three (3) good faith efforts to the neglected, delinquent, and adult correctional facilities within their boundaries.

In instances in which a neglected, delinquent, or adult correctional facility has not responded to the LEA's requests to complete and return the required Title I-D LEA Annual Count Form, the LEA must upload documentation of its efforts in EMAC, as part of its Title I-D LEA Annual Count. The documentation must include the following elements for each of the good faith efforts to connect with the institution:

- Date,
- Time,
- Name & Type of Institution (i.e., neglected, delinquent, or adult correctional facility),
- Type of Contact (i.e., email, phone call, in-person visit, etc.),
- Contact Information for Institution Representative used by the LEA,
- Type of Contact (i.e., email, phone call, in-person visit, etc.), and
- Description of Contact Attempt Progression (i.e., reaching out to institution supervisors, visiting the institution in person, etc.)

Overlapping Boundaries: In instances in which an eligible facility is located within overlapping boundaries, more than one LEA may be responsible for reporting eligible students residing in the facility.

- **Example:** If the facility serves both elementary-aged and secondary-aged students, each LEA serving the attendance area must report the number of eligible children and youth residing in the facility based on the grade span it serves.
 - **Elementary School LEA:** Must report the number of elementary-aged students residing in the facility during the same 30-day window as the secondary school LEA.

- **Secondary School LEA:** Must report the number of secondary-aged students residing in the facility during the same 30-day window as the elementary school LEA.
- **Clarification:** Neither LEA should report students outside of its grade span responsibility, and neither LEA should include students based on who provides instruction at the facility.
- The LEAs must coordinate to avoid reporting duplicated or omitted counts of eligible children and youth residing in the facility.
 - Accurately splitting counts by grade span ensures that each LEA's Title I-A allocation and Title I-D, Subpart II subgrant eligibility accurately reflects each of their needs and responsibilities.

Multigrade-level Facility: In instances in which an eligible facility serving grade spans outside of those of the LEA in which it is located, the LEA is responsible for reporting all eligible children and youth residing in the facility.

- **Example:** If the facility serves both elementary-aged and secondary-aged students and is located within the boundaries of a Type 03 District, the LEA must report the number of all eligible children and youth residing in the facility, regardless of grade-level.

Title I-D LEA Annual Count Deadline: Friday, December 19, 2025.

Please visit the [Title I-D webpage](#) and contact ESEA@azed.gov for additional support in completing the Title I-D LEA annual count.

Respectfully,



**ARIZONA DEPARTMENT OF
EDUCATION**

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