



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

July 15, 2024

Iowa Department of Education
400 East 14th Street
Des Moines, IA 50319

Attention: AEA and LEA administrators and staff overseeing Title I, Part D, Subparts 1 and 2 Neglected and Delinquent Programs

Re: Title I, Part D, Subparts 1 and 2 facility eligibility and program oversight

To Whom it May Concern:

According to the National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (NDTAC) and the U.S. Department of Education, the Iowa Department of Education is required to update the facility eligibility metrics for qualifying facilities under the Title I, Part D program.

Per 20 U.S.C. § 6472, a facility must meet the following criteria in order to be considered a facility for Neglected children:

“a public or private residential facility, other than a foster home, that is operated for the care of children 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.”

Per *Ibid*, a facility must meet the following criteria in order to be considered a facility for Delinquent children:

“a public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision.”

In order to meet the above stated criteria, all Neglected and Delinquent facilities must, as their primary purpose, operate with the goal of providing services and support to children, youth, and young adults in state custody either due to being adjudicated as a Child in Need of Assistance (CINA), or adjudicated Delinquent and placed into the custody of the Juvenile or Adult Court System. Consequently, any residential facility whose purpose or population does not consist of a preponderance of Neglected or Delinquent children and youth does not meet these criteria.

While the application of this guidance for many facilities were clear at the outset, the Department also identified a number of facilities that may or may not have met these criteria in the most recently completed fiscal year. Accordingly, the Department requested that 24 facilities undergo a fidelity check with the purpose of determining whether a facility was serving a significant number of children and youth in custody of either the Department of Health and Human Services (HHS) or Juvenile Court Services (JCS). At the conclusion of this test, the Department determined that some facilities will continue to qualify for Title I, Part D funding, and some do not currently meet the minimum criteria as determined by the Department. The Department has determined that subsequent reviews will occur every three years; meaning that some facilities sub-granted under Title I, Part D during this current funding period may be found eligible, or ineligible, in the future.

Ensuring all students experience a world-class education.

The next fidelity check for Neglected or Delinquent facility eligibility will occur in Fiscal Year 2027. In the interim, any facility may request a re-evaluation of their eligibility if they experience a leadership change, open a new facility, or undergo a significant change in the population served in the facility (including a licensure change). Facilities may contact the Department with any questions regarding this process.

The change in eligibility for these facilities does not remove the Local or Area Education Agency’s legal obligation to provide educational services to children and youth in all congregate care facilities, including hospitals, Psychiatric Medical Institutions for Children (PMICs), and residential treatment centers whose primary purpose is providing services to children and youth with substance use disorders or problematic sexualized behaviors.

Beginning in Fiscal Year 2025, the following facilities will be administered Title funding under the metrics and categories herein.

The following facilities will continue to be eligible for Title I, Part D Subpart 1 Delinquent:

| Subgrantee | Facility Name |
|---|---|
| Department of Corrections | Anamosa State Penitentiary |
| Department of Corrections | Clarinda Correctional Facility |
| Department of Corrections | Fort Dodge Correctional Facility |
| Department of Corrections | Iowa Correctional Institution for Women |
| Department of Corrections | Iowa Medical & Classification Center |
| Department of Corrections | Iowa State Penitentiary |
| Department of Corrections | Mt. Pleasant Correctional Facility |
| Department of Corrections | Newton Correctional Facility |
| Department of Corrections | North Central Correctional Facility |
| Department of Health and Human Services | State Training School for Boys |

The following facility will continue to be eligible for Title I, Part D Subpart 1 Neglected:

| Subgrantee | Facility Name |
|---|--------------------------------------|
| Department of Health and Human Services | Independence Mental Health Institute |

The following facilities will be eligible for Title I, Part D Subpart 2 Delinquent:

| Subgrantee | Facility Name |
|----------------------|--|
| Cedar Rapids CSD | Four Oaks STOP Houses 1-3 |
| Central Rivers AEA | Central Iowa Juvenile Detention Center |
| Central Rivers AEA | North Iowa Juvenile Detention Services |
| Fort Dodge CSD | Community and Family Resources – STARS Program |
| Grant Wood AEA | Linn County Juvenile Detention Center |
| Great Prairie AEA | South Iowa Area Detention Service Agency |
| Green Hills AEA | Southwest Iowa Juvenile Detention Center |
| Heartland AEA | Polk County Juvenile Detention Center |
| Linn-Mar CAD | Four Oaks Marion QRTP |
| Mississippi Bend AEA | Scott County Youth Justice and Rehabilitation Center |
| Northwest AEA | Northwest Iowa Youth Emergency Services Multi-County Juvenile Detention Center |
| Northwest AEA | Woodbury County Juvenile Detention Center |
| Sioux City CSD | Jackson Recovery Center |
| Woodward-Granger CSD | Woodward Academy |

The following facilities will continue to be eligible for supplemental funding for Neglected children and youth, which going forward will be administered under Title I, Part A:

| Subgrantee | Facility Name |
|------------------------|---|
| Cardinal CSD | American Home Finding Association - Corinthians Home |
| College CSD | Four Oaks South Oaks QRTP |
| Dubuque CSD | Hillcrest Family Services SAL |
| Independence CSD | Four Oaks Independence QRTP |
| Johnston CSD | Ellipsis QRTP |
| Mason City CSD | Four Oaks PMICs (Cambridge & Berkeley) |
| Mason City CSD | Four Oaks Durham QRTP |
| Sioux Central CSD | Midwest Christian Services QRTP |
| Sioux City CSD | Boys and Girls Home and Family Services |
| Waverly-Shell Rock CSD | Lutheran Services in Iowa Bremwood QRTP (CLOSING FY 2024) |
| Waverly-Shell Rock CSD | Lutheran Services in Iowa Bremwood SAL |

The following facilities are Juvenile Homes under Iowa State Code Chapter 63. These facilities will continue to be eligible for supplemental funding for Neglected children and youth under Title I, Part A, which going forward will be subgranted via a mutual written agreement between the AEA and LEA:

| Subgrantee | LEA Boundaries (Physical Location) | Facility Name |
|--------------------|---|--|
| Central Rivers AEA | Mason City CSD | Brookhaven Youth Shelter |
| Central Rivers AEA | Waverly-Shell Rock CSD | Woodhaven Shelter |
| Grant Wood AEA | Cedar Rapids CSD | Foundation II Youth Shelter |
| Great Prairie AEA | Cardinal CSD | American Home Finding Association - Emergency Shelter Care |
| Green Hills AEA | Council Bluffs CSD | Children's Square USA - Emergency Shelter |
| Heartland AEA | Des Moines ISD | Ellipsis Shelter |
| Heartland AEA | Ballard CSD (SY 24-25) | Rosedale Shelter |
| Northwest AEA | Sioux City CSD | Crittenton Center Transitional Therapeutic Home |
| Prairie Lakes AEA | Fort Dodge CSD | Youth Shelter Care of North Central Iowa |

The following facilities are Psychiatric Medical Institutions for Children (PMICs) which, based on the most recent review, are not serving a significant population of Neglected or Delinquent children and youth, and therefore are no longer eligible for Title I, Part D supplemental funding. However, per the PMIC contract with the State of Iowa, all students in these facilities are entitled to services and support from the LEAs in which they are located.

| Subgrantee | Facility Name |
|--------------------|---|
| Cedar Rapids CSD | Tanager Place PMIC |
| College CSD | Four Oaks PMICs (McIntyre, North Oaks & Smith Center) |
| Council Bluffs CSD | Children's Square USA - Schlott Cottage PMIC |
| Des Moines ISD | Orchard Place PMIC |
| Dubuque CSD | Hillcrest Family Services PMIC |

The following facility is a residential treatment center for children and youth with substance use disorders which, based on the most recent review, is not serving a significant population of Neglected or Delinquent children and youth, and therefore are no longer eligible for Title I, Part D supplemental funding. However, per Iowa Code § 282.19, all students in facilities of this type are entitled to services and support from the LEAs in which they are located.

| Subgrantee | Facility Name |
|------------------------|----------------------|
| Ballard CSD (SY 24-25) | YSS Ember Recovery |

The following facility is an intermediate care facility for individuals with intellectual disabilities (ICF-ID), which is not serving a significant population of Neglected children and youth, and therefore are no longer eligible for Title I, Part D supplemental funding. However, all students in facilities of this type are entitled to services and support from the LEAs in which they are located, in accordance with the service plan from the student's care team.

| Subgrantee | Facility Name |
|-------------------|----------------------------------|
| Rock Valley CSD | Hope Haven, Inc. – Neissink Home |

The Iowa Department of Education is committed to supporting all impacted facilities through this transition. We understand that a number of subgrantees and other stakeholders will have questions regarding this transition. There will be additional guidance and support forthcoming, and in the meantime, please contact Elisa Koler, Education Program Consultant over Title I, Part D, at (515) 669-4052 or elisa.koler@iowa.gov.

Sincerely,



Jillian Dotson

Chief, Bureau of Federal Programs