

## DIRECT CERTIFICATION AS REPLACEMENT FOR FRPL

### **What is Free and Reduced Price Lunch (FRPL)?**

“Free and Reduced Price Lunch” is a commonly used, informal name for the U.S. Department of Agriculture’s National School Lunch Program (NSLP).<sup>1</sup> Connecticut students who are eligible for the National School Lunch and School Breakfast programs are generally referred to as being eligible for free or reduced price lunch, or “FRPL.” The NSLP has an income threshold of 185 percent of the federal poverty guidelines (FPG), or \$46,435 per year for a family of four.<sup>2</sup>

### **How is FRPL currently used in the Education Cost Sharing (ECS) Formula?**

In the Education Cost Sharing (ECS) formula, which is the primary means of distributing state education aid to Connecticut’s public school districts, FRPL-eligibility is used as a proxy for counting low-income students. School districts receive an additional 30 percent of the ECS formula’s foundation amount for students who are identified as FRPL-eligible. The ECS formula also includes a concentrated poverty weight, which, for districts with 75 percent or more of their enrolled students identified as FRPL-eligible, increases the foundation amount an additional five percent (for a total of 35 percent) for each student above the 75-percent level.<sup>3</sup> These weights direct additional resources to districts based on the number and percentage of low-income students served.

### **What is the Community Eligibility Provision (CEP)?**

The Community Eligibility Provision (CEP) of the federal Healthy, Hunger Free Kids Act of 2010 allows all students to receive no-cost meals if their school or district qualifies and participates.<sup>4,5</sup> Since its introduction, CEP participation rates in Connecticut have increased annually and are likely to continue increasing as more eligible schools and districts adopt the program.<sup>6</sup> For the 2018-19 school year, 66 districts and 267,620 (more than half) of Connecticut students were participating, eligible to participate, or near eligible to participate in CEP.<sup>7</sup>

### **Why does Connecticut need a new method for counting low-income students?**

While CEP is a valuable nutrition program, it makes FRPL functionally unusable as a proxy for low-income students in the ECS formula because participating schools and districts are no longer required to individually count students who are eligible, making FRPL rates inaccurate.<sup>8</sup> Additionally, despite the simplicity of using FRPL-eligibility to identify low-income students, researchers warn FRPL-eligibility may be an inaccurate proxy for low-income students. Instead, researchers suggest low-income students be identified using multiple income-verified measures.<sup>9</sup> As a result, the ECS formula needs to be updated with a better proxy for identifying low-income students to effectively and accurately direct resources to higher-need students.

### **What is direct certification?**

Direct certification is a method by which students can be deemed eligible for no-cost school meals through the NSLP. This provision allows students who are categorically deemed at-risk of hunger to qualify for no-cost meals without needing to complete an application for FRPL.<sup>10</sup> Connecticut school districts must directly certify students if they are enrolled in: the Supplemental Nutrition Assistance Program (SNAP), otherwise known as food stamps; Temporary Family Assistance (TFA), otherwise known as cash assistance; and state- or federally-funded Head Start programs.<sup>11</sup> These programs are “means-tested,” in that they have income limits associated with obtaining services. Income limits vary by program and by state, but most are lower than the NSLP’s income limit of 185 percent of the FPG and range from 36 percent of the FPG for TFA<sup>12</sup> to 201 percent of the FPG for HUSKY A, although only children who live in households at or below 130 percent of the FPG are directly certified for free lunch.<sup>13,14,15</sup> Additionally, districts may directly code students as foster, homeless, migrant, or runaway youth to qualify them for direct certification.<sup>16</sup> Beginning in 2018, students who live in households at or below 130 percent of the FPG and receive free Medicaid, known in Connecticut as HUSKY A, will also be directly certified for CEP but are identified at the state level. Children who live in households between 130 percent and 185 percent of the FPG and receive free Medicaid are directly certified for reduced price lunch, and are not counted in the Identified Student Percentage for the purposes of CEP eligibility.<sup>17</sup>

## What is HUSKY A?

HUSKY A is Connecticut's federally subsidized medical insurance program (free Medicaid) for low-income families,<sup>18</sup> which includes children from birth to age 19 and their caregivers.<sup>19</sup> Families do not incur any costs for their children covered under HUSKY A.<sup>20</sup> Income limits to be covered by HUSKY A are 155 percent of the FPG per year for caregivers and 201 percent of the FPG for children.<sup>21</sup> Roughly 93 percent of all eligible children in Connecticut participate in HUSKY A,<sup>22</sup> surpassing the national average of 88 percent.<sup>23</sup>

## What is the Identified Student Percentage (ISP)?

The percentage of students in a school or district identified as eligible for the NSLP via direct certification is known as the Identified Student Percentage (ISP).<sup>24</sup> If a district's ISP is at least 40 percent of all students, the district is eligible for CEP.<sup>25</sup> A Connecticut public school district's ISP includes both the number of students directly certified by the school district, and the number of unduplicated students eligible for HUSKY A medical insurance for students at or below 130 percent of the FPG.<sup>26,27</sup> The inclusion of HUSKY A data in the ISP is a new method of direct certification as of 2018.<sup>28</sup> A district's ISP is then multiplied by 1.6 to determine the total percentage of meals that will be reimbursed at the federal reimbursement rate for free meals, also known as the "free rate," up to a maximum of 100 percent.<sup>29</sup> This is done to more accurately assess the number of students who would otherwise have been eligible for free or reduced price meals, as the number of students directly certified is only a subset of the total number of students eligible for the NSLP.<sup>30</sup>

## Why are FRPL Counts Different than ISP Counts?

FRPL counts and ISP counts are two different ways of counting low-income students for the purposes of qualifying them to receive no-cost or low-cost school meals under the NSLP. FRPL counts were derived from self-reported income information provided by parents or guardians on individual forms collected by schools and then reported to the USDA by school districts in order to receive reimbursement for school meals.<sup>31</sup> ISPs are the number of students directly certified for the NSLP through their eligibility and participation in other means-tested, income-verified federally-funded social service programs.<sup>32</sup> ISPs also do not include students who are eligible for reduced price meals as only a subset of children receiving free Medicaid are included.<sup>33</sup> Because the two methods of counting low-income students are different, the counts are also different. However, as more and more schools and districts begin to participate in CEP, ISPs will become a more accurate proxy for low-income students, even though a multiplier may be needed to capture similar numbers of students as were counted under the old method of qualifying for the NSLP.

<sup>1</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. (2013). *Direct Certification in the National School Lunch Program State Implementation Progress, School Year 2012-2013, Report to Congress - Summary*. Washington, DC: Author. Retrieved from [http://www.fns.usda.gov/sites/default/files/NSLPDirectCertification2013\\_Summary.pdf](http://www.fns.usda.gov/sites/default/files/NSLPDirectCertification2013_Summary.pdf).

<sup>2</sup> Child Nutrition Programs: Income Eligibility Guidelines, 83 Fed. Reg. 20,788, 20,789 (May 8, 2018).

<sup>3</sup> Conn. Acts 17-2 (June Special Session), § 226.

<sup>4</sup> Healthy, Hunger-Free Kids Act of 2010, Pub. L. No. 111-296, § 104, 124 Stat. 3193, 3194-3201 (2010).

<sup>5</sup> Connecticut State Department of Education. (2016, April 29). Community Eligibility Provision (CEP). Retrieved from <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=335336>.

<sup>6</sup> Segoi, B., Hewins, J., Sanderson, M., Nchako, C., Neuberger, Z., Cai, L., & Maurice, A. (2016). *Community Eligibility Adoption Rises for the 2015-16 School Year, Increasing Access to School Meals*. Washington: Center for Budget and Policy Priorities and the Food Resource Action Center. Retrieved from <http://frac.org/pdf/take-up-of-cep-report.pdf>.

<sup>7</sup> Connecticut State Department of Education. (2018). *Community Eligibility Provision (CEP) Annual Notification of Local Educational Agencies (LEAs), Data for School Year 2018-19*. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/NotificationLEA.pdf#q=en>.

<sup>8</sup> Connecticut School Finance Project. (2016). *Achieving a Better Proxy for Student Poverty in Connecticut*. New Haven, CT: Author. Retrieved from <http://ctschoolfinance.org/reports/student-poverty-proxy>.

<sup>9</sup> National Forum on Education Statistics. (2015). *Forum Guide to Alternative Measures of Socioeconomic Status in Education Data Systems (NFES 2015-158)*. Washington, DC: U.S. Department of Education, National Center for Education Statistics. Retrieved from <http://nces.ed.gov/pubst2015/2015158.pdf>.

<sup>10</sup> Moore, G., Conway, K., Kyle, B., & Gothro, A. (2013). *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012-2013, Report to Congress (CN-13-DC)*. Washington, DC: U.S. Department of Agriculture, Office of Policy Support. Retrieved from <http://www.fns.usda.gov/sites/default/files/NSLPDirectCertification2013.pdf>.

<sup>11</sup> Connecticut State Department of Education. (2018). Direct Certification for School Nutrition Programs. Retrieved from <https://portal.ct.gov/SDE/Nutrition/Direct-Certification>.

<sup>12</sup> Bremby, Roderick. (2017). *State of Connecticut Temporary Assistance for Needy Families (TANF) State Plan, Federal Fiscal Years 2018, 2019, & 2020*. Hartford, CT: State of Connecticut, Department of Social Services. Retrieved from <https://portal.ct.gov/-/media/Departments-and-Agencies/DSS/Reports/Misc-Reports/CT-TANF-State-Plan-2018-2020.pdf#q=en>.

<sup>13</sup> State of Connecticut, Department of Social Services. (2018). *Connecticut HUSKY Health Program Annual Income Guidelines - effective for use July 1, 2018*. Hartford, CT: Author. Retrieved from <http://www.ct.gov/hh/hh/pdf/HUSKYAnnualIncomeChart.pdf>.

<sup>14</sup> U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. (2018). *Poverty Guidelines: U.S. Federal Poverty Guidelines Used to Determine Financial Eligibility for Certain Federal Programs*. Retrieved from <https://aspe.hhs.gov/poverty-guidelines>.

<sup>15</sup> Yearwood, S. (2018, October 12). Personal Communication with the Executive Director of End Hunger Connecticut.

<sup>16</sup> Frassinelli, J. (2014, August 4). *Letter to Sponsors to the School Child Nutrition Programs RE: Direct Certification*.

<sup>17</sup> Lees, V., & Cooper, T. (2016). *Using Medicaid Data to Connect Kids to Free & Reduced Price School Meals through Direct Certification* [PowerPoint slides]. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from <https://s3.amazonaws.com/pnresources/pid-342/topic-148953/912837432-Direct+Certification+with+Medicaid+Webinar+Handout.pdf>.

<sup>18</sup> Section 370 of Conn. Acts 15-05 (June Special Session) changed the eligibility criteria for HUSKY A, non-pregnant adult caregivers. Based on this change (which reduced the eligibility cap from 201% of the federal poverty level to 155% of the FPL), fewer adults will be covered under HUSKY A. According to the Connecticut General Assembly's Office of Fiscal Analysis, about 24,000 adults will be transitioned to the healthcare exchange.

<sup>19</sup> Connecticut General Assembly, Office of Fiscal Analysis. (2015). *Connecticut State Budget: FY 16 & FY 17 Budget*. Hartford, CT: Author. Retrieved from [https://www.cga.ct.gov/ota/Documents/year/B8/2016BB-20151007\\_FY%2016%20and%20FY%2017%20Connecticut%20Budget.pdf](https://www.cga.ct.gov/ota/Documents/year/B8/2016BB-20151007_FY%2016%20and%20FY%2017%20Connecticut%20Budget.pdf).

<sup>20</sup> Conn. Gen. Statutes ch. 319v, § 17b-261, as amended by section 17 of Conn. Acts 15-69 and section 370 of Conn. Acts 15-05 (June 2015 Special Session).

<sup>21</sup> *Ibid.*

<sup>22</sup> State of Connecticut, Department of Social Services. (2018). *Connecticut HUSKY Health Program Annual Income Guidelines - effective for use July 1, 2018*. Hartford, CT: Author. Retrieved from <http://www.ct.gov/hh/hh/pdf/HUSKYAnnualIncomeChart.pdf>.

<sup>23</sup> *Ibid.*

<sup>24</sup> U.S. Department of Health & Human Services, Centers for Medicare & Medicaid Services. (n.d.). Medicaid & CHIP Participation Rates. Retrieved from <https://www.insurekidsnow.gov/campaign/participation-rates/index.html>.

<sup>25</sup> *Ibid.*

<sup>26</sup> Connecticut State Department of Education. (2018). *Community Eligibility Provision (CEP): Go for the Gold!* [PowerPoint slides]. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPpresentationCSDE.pdf>.

<sup>27</sup> U.S. Department of Education, Office of Elementary and Secondary Education. (2015). *GUIDANCE: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended*. Retrieved from <https://www2.ed.gov/programs/titleiparta/15-0011.doc>.

<sup>28</sup> Connecticut State Department of Education. (2018). *Community Eligibility Provision (CEP): Go for the Gold!* [PowerPoint slides]. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPpresentationCSDE.pdf>.

<sup>29</sup> Lees, V., & Cooper, T. (2016). *Using Medicaid Data to Connect Kids to Free & Reduced Price School Meals through Direct Certification* [PowerPoint slides]. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from <https://s3.amazonaws.com/pnresources/pid-342/topic-148953/912837432-Direct+Certification+with+Medicaid+Webinar+Handout.pdf>.

<sup>30</sup> Connecticut State Department of Education. (2018). *Community Eligibility Provision (CEP): Go for the Gold!* [PowerPoint slides]. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPpresentationCSDE.pdf>.

<sup>31</sup> *Ibid.*

<sup>32</sup> U.S. Department of Education (2014). *Guidance: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of 1965, As Amended*. Available from: <https://www2.ed.gov/programs/titleiparta/13-0381guidance.doc>

<sup>33</sup> Cruse, C., & Powers, D. (2004). *Estimating School District Poverty with Free and Reduced-Price Lunch Data*. Washington, DC: U.S. Census Bureau, Small Area Estimates Branch. Retrieved from <https://www.census.gov/content/dam/Census/library/working-papers/2006/demo/crusepowers2006asa.pdf>.

<sup>34</sup> Connecticut State Department of Education. (2018). *Community Eligibility Provision (CEP): Go for the Gold!* [PowerPoint slides]. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPpresentationCSDE.pdf>.

<sup>35</sup> Lees, V., & Cooper, T. (2016). *Using Medicaid Data to Connect Kids to Free & Reduced Price School Meals through Direct Certification* [PowerPoint slides]. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from <https://s3.amazonaws.com/pnresources/pid-342/topic-148953/912837432-Direct+Certification+with+Medicaid+Webinar+Handout.pdf>.