

UPDATING HOW CONNECTICUT COUNTS LOW-INCOME STUDENTS

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).¹ 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.²

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.³ These weights direct additional resources to districts based on the number and percentage of low-income students served.

What is direct certification? How does it change how students are identified as eligible for FRPL?

Historically, students were identified as eligible for FRPL by asking families to return paper-based household income surveys to school. Because the NSLP was designed as an anti-hunger program, and not a proxy for counting low-income students, researchers have warned this may have resulted in inaccurate low-income student counts and, instead, recommend low-income students be identified using multiple income verified measures.^{4,5}

After Congress passed the Healthy and Hunger Free Kids Act (2010), Connecticut began to adopt a new method of counting low-income students called 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.⁶

Using this new method, a student is directly certified by Connecticut’s Department of Social Services for FRPL when the student is enrolled in income verified social services programs that are available to low-income residents of the state, including SNAP (previously known as food stamps) and TFA (also known as temporary cash assistance). Starting in July 2017, children enrolled in Medicaid (HUSKY) were added to the list of students directly certified for free and reduced price meals.⁷ Students can also be directly certified if they are in foster care, homeless, runaway, or attend a Head Start program.⁸

Importantly, Connecticut uses a broad constellation of programs to directly certify students as eligible for FRPL, which the Urban Institute cites as a promising approach to ensuring accurate counts of low-income students using direct certification.⁹ Additionally, the programs Connecticut uses to directly certify students have high participation rates, which means most of the children who are eligible to participate in these programs are participating. For example, as of 2015, children’s Medicaid in Connecticut has a participation rate of 94.5 percent,¹⁰ and the number of children enrolled increased by another 30,000 between 2015 and 2018.¹¹ Additionally, according to the Urban Institute, Connecticut has one of the strongest direct certification processes in the country with 100 percent of school-age SNAP participant children directly certified for free meals in the 2014–15 school year.¹²

Connecticut has counted low-income students using paper-based household income surveys for years, why can't the state just keep using them?

All Connecticut districts are now participating in direct certification for the NSLP. To reduce the administrative burden on school districts, the U.S. Department of Agriculture has officially eliminated paper-based household income surveys for all schools and districts participating in the Community Eligibility Provision (CEP).¹³ As a result, paper-based household income surveys are no longer being collected in these districts, except for when a non-identified student is entering the district for the first time.¹⁴

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.^{15,16} 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.¹⁷ 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.¹⁸

Will changing how Connecticut counts low-income students in the Education Cost Sharing (ECS) formula affect how many students receive free and reduced price lunch in school?

No, changing how the state counts low-income students for purposes of calculating ECS grant amounts has no effect on how many students receive free or reduced price lunch meals through the NSLP. All students currently receiving free or reduced price meals will continue to receive them no matter what low-income student count is used for the ECS formula.

Will switching to direct certification from free and reduced price lunch result in 26,053 less students being counted as low-income in the ECS formula

No, in fiscal year 2019 there were 182,177 students statewide counted as low-income using FRPL, and in FY 20 there are 182,319 students who would be counted as low-income using direct certification (this is an increase of 142 students).

In addition to those students who would be counted as low-income using direct certification for the purpose of the ECS formula, the Connecticut State Department of Education has proposed including two small groups of students to the low-income student count used for the ECS formula. These groups are 1) homeless students in the Public School Information System (PSIS) who are not directly certified and 2) students in the PSIS from active duty military families who are not directly certified but are identified by their respective school districts as eligible for FRPL. The addition of these two groups would increase the low-income student count for FY 20 by 843 students to 183,162 (an increase of 985 students from FY 2019).¹⁹

Furthermore, during a March 6, 2019 hearing before the Connecticut General Assembly's Appropriations Committee, the Connecticut State Department of Education's commissioner and chief financial officer repeatedly stated there are "data integrity" issues with the FRPL numbers included in the General Assembly's Office of Fiscal Analysis' *Synopsis of the Governor's Budget* and reported on EdSight, the state's education data repository. The commissioner testified the department is investigating the cause of the discrepancies. In other words, the 2018 FRPL data contained in the OFA report are not accurate and should not be used to compare against the direct certification figures.

For context, an increase of 26,053 FRPL-eligible students is a five percentage point increase in the number of students identified as low-income. An increase of this size would put the number of children identified as low-income at 16,000 higher than the highest FRPL count in recent history at a period of declining enrollment statewide.

Will fewer English Learners be counted as low-income using direct certification?

Prior to the adoption of direct certification, research suggested English Learners, as well as undocumented immigrants, were less likely to submit paper-based household income forms and be identified as eligible for FRPL.²⁰ In fact, increasing access to free meals for students in families with limited English proficiency was cited by advocates as a reason to adopt direct certification.²¹

However, one legitimate concern is that non-citizen children, who may not be eligible for the social service programs used to directly certify students, may not be counted.²² This issue could be resolved by counting all English Learners as low-income students for purposes of ECS funding. This method is used by Vermont, whose low-income weight applies to all low-income students, including low-income English Learners, as well as English Learners whose families are not low-income. While this may lead to some over-identification of low-income students, it will help to ensure the accurate identification of Connecticut's undocumented students as low-income students.

Why would a town's direct certification count be lower than its FRPL numbers?

Direct certification is a new, more accurate method of counting low-income students, and as a result, it is expected that the number of students identified through direct certification will be different than the number identified through previous methods. Researchers found that under the old method of determining FRPL eligibility (using paper-based forms), up to 20 percent of students were misclassified, with the most common error being students as FRPL-eligible when they were not.²³

Additionally, it is possible that, because of the CEP, which results in all students in some districts and schools receiving free lunch, some students were previously misidentified as being eligible for free lunch even though those students did not meet the income requirements.

¹ 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.

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

³ Conn. Acts 17-2 (June Special Session), § 226.

⁴ 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, Institute of Education Sciences, National Center for Education Sciences. Retrieved from <http://nces.ed.gov/pubs2015/2015158.pdf>.

⁵ Harwell, M., & LeBeau, B. (2010). Student Eligibility for a Free Lunch as an SES Measure in Education Research. *Educational Researcher*, 39(2), 120-131.

⁶ Moore, Q., Conway, K., Kyler, 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>.

⁷ Connecticut State Department of Education. (2019). *Important Points for Direct Certification with Medicaid*. Hartford, CT: Author. Retrieved from <https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/DirectCert/DCMedicaidPoints.pdf?la=en>.

⁸ Ibid.

⁹ Greenberg, E. (2019, March 1). *Toward an Accurate Count of Low-income Students*. Hartford, CT: Connecticut General Assembly, Education Committee. Retrieved from https://www.urban.org/sites/default/files/publication/99856/2019_03_01_toward_an_accurate_count_of_low-income_students.pdf.

¹⁰ Henry J. Kaiser Family Foundation. (n.d.). Medicaid/CHIP Child Participation Rates. Retrieved from <https://www.kff.org/medicaid/state-indicator/medicaidchip-child-participation-rates/?currentTimeframe=0&selectedRows=%7B%22states%22:%7B%22connecticut%22:%7B%7D%7D%7D&sortModel=%7B%22colld%22:%22Location%22,%22sort%22:%22asc%22%7D>.

¹¹ Ibid.

¹² Greenberg, E. (2019, March 1). *Toward an Accurate Count of Low-income Students*. Hartford, CT: Connecticut General Assembly, Education Committee. Retrieved from https://www.urban.org/sites/default/files/publication/99856/2019_03_01_toward_an_accurate_count_of_low-income_students.pdf.

¹³ 7 C.F.R. § 245 (2016). <https://www.govinfo.gov/content/pkg/FR-2016-07-29/pdf/2016-17232.pdf>

¹⁴ Connecticut State Department of Education. (2017). 2017-18 Alternative Income Survey. Retrieved from https://portal.ct.gov/-/media/SDE/Performance/Data-Collection/Help-Sites/PSIS/CEP/CEP_AlternativeIncomeSurvey.pdf?la=en.

¹⁵ Healthy, Hunger-Free Kids Act of 2010, Pub. L. No. 111-296, § 104, 124 Stat. 3193, 3194-3201 (2010).

¹⁶ 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>.

¹⁷ Segai, 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>.

¹⁸ 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/CEPNotificationLEA.pdf?la=en>.

¹⁹ Connecticut State Department of Education. (2019). Education Cost Sharing Grant: Poverty Measure – Free/Reduced Price Lunch, Proposed Change in Source Data Fact Sheet. Hartford, CT: Author.

²⁰ 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, Institute of Education Sciences, National Center for Education Sciences. Retrieved from <http://nces.ed.gov/pubs2015/2015158.pdf>.

²¹ Levin, M., & Hewins, J. (2014). Universal Free School Meals: Ensuring that All Children Are Able to Learn. *Clearinghouse Review Journal of Poverty Law and Policy*, 47(11-12), 390-399. Retrieved from https://www.povertylaw.org/files/docs/article/chr_2014_march_april_levin.pdf.

²² Greenberg, E. (2019, March 1). *Toward an Accurate Count of Low-income Students*. Hartford, CT: Connecticut General Assembly, Education Committee. Retrieved from https://www.urban.org/sites/default/files/publication/99856/2019_03_01_toward_an_accurate_count_of_low-income_students.pdf.

²³ Harwell, M., & LeBeau, B. (2010). Student Eligibility for a Free Lunch as an SES Measure in Education Research. *Educational Researcher*, 39(2), 120-131.