

Alternative Approaches to Using School Meals Data in Community Eligibility (CEP) Schools

School districts operating traditional meal programs (that is, not using the Community Eligibility Provision or Provision 2 or 3) directly certify students for free school meals and distribute school meal applications to remaining students. Data from meal applications are imperfect: not every low-income family fills out the form at the beginning of the school year; the program doesn't reach many near-poor families whose income is between 130 and 185 percent of the federal poverty line; and some families' incomes decline after school districts process meal applications. Because school districts using the Community Eligibility Provision no longer collect meal applications at all schools, states have developed alternative data sources for assessing the poverty level of schools. The main approaches are described below.

Method	How It Works (State Policy)	Benefits	Issues to Consider	State Example
Use Identified Student Percentage x 1.6	Districts use their percentage of identified students multiplied by 1.6 in place of percentage of students receiving free and reduced price meals; schools that participate as part of a group will still need to calculate their individual identified student percentage for some purposes	<ul style="list-style-type: none"> • Data readily available, and compatible with many existing data systems • Does not affect data collection procedures for non-CEP schools 	<ul style="list-style-type: none"> • The percentage of identified students multiplied by 1.6 is an approximation of but not identical to the previous percentage of students approved for free or reduced price meals • Community eligibility data does not identify the individual income levels of all children 	Texas
Use most recent free and reduced price school meals data	Districts use the most recent free and reduced price school meals data; may include option to reassess after a few years	<ul style="list-style-type: none"> • Prevents a sudden change in poverty level at schools adopting CEP • No immediate need for further data collection 	<ul style="list-style-type: none"> • Does not account for shifts over time unless updated, or capture individual-level income data • Over time it may not be comparable to newer data from non-CEP schools 	Arkansas
Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	Districts use existing data from other means-tested programs to create a new measure	<ul style="list-style-type: none"> • Data from other means-tested programs is typically subject to rigorous accountability controls • Data is readily available and already commonly used by school districts 	<ul style="list-style-type: none"> • Could miss low-income children whose families do not participate in means-tested programs • Must take care to ensure CEP and non-CEP schools are treated consistently 	District of Columbia
Collect alternative income forms every 4 school years	Districts use results from household income surveys and combine them with available direct certification data to determine which children are low-income and use data for 4-year cycle	<ul style="list-style-type: none"> • Less burdensome than annual data collection • Allows for a simpler form than school meals applications 	<ul style="list-style-type: none"> • Maintains paperwork and new tracking system • Costs cannot be covered by school food service account 	California
Collect alternative income forms annually	Districts use results from household income surveys and combine with available direct certification data to determine which children are low-income	<ul style="list-style-type: none"> • Generates income data for each household/student 	<ul style="list-style-type: none"> • Maintains annual paperwork • Costs cannot be covered by school food service account 	Washington

State Approaches in the Absence of Meal Applications

State	Data Collection Method	Do State Education Funding Formulas Consider NSLP Eligibility or Data?	Summary of State Education Funding Policy for Schools Electing CEP	Alternative Income Form Required?	Alternative Income Form Provided by State?
Alabama	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier.	No	No
Alaska	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Arizona	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Arkansas	Use most recent free and reduced price school meals data	Yes	State funding for CEP schools is established using school meals data from the year prior to beginning CEP, which is used for the entire four year cycle. If at the end of four years the identified student percentage has changed by at least five percentage points, schools must collect new data through alternate household income forms. Data collected from the forms serves as the basis for state funding allocations for the next four years.	No	Yes
California	Collect alternative income forms every 4 school years	Yes	CEP schools collect alternative income forms in a base year and may use that data for up to four years. Data is collected annual for newly enrolled students.	Yes	Yes
Colorado	Collect alternative income forms every 4 school years	Yes	CEP schools collect alternative income forms in a base year and may use that data for up to four years (or whenever a new 4 year CEP cycle is started). Data is collected annual for newly enrolled students.	Yes	No
Connecticut	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools for ECS funding. However, state education funding has been frozen for several school years and alternative forms have not been used for this purpose.	Yes	Yes
D.C.	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	State identifies low income students using data from programs like TANF and SNAP and students identified as foster, migrant or homeless.	No	No
Delaware	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	State identifies low income students as those who receive TANF or SNAP.	No	No

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Florida	No use of free and reduced price data or similar in state funding formula	No	School meals data are not used to distribute state aid. State does not allow school districts to collect alternative income forms for other purposes, such as Title I.	No	No
Georgia	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Hawaii	Collect alternative income forms annually (required)	No	State is requiring DOE schools to collect a "household survey" for data needs of any applicable programs. Not needed for state education funding (WSF).	Yes	Yes
Idaho	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Illinois	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	Yes	Only Chicago Public Schools requires collection of alternative income forms due to unique treatment in state education funding formula. Forms may be used by other districts on an optional basis for large district supplemental aid. All other districts use the count of children who receive services from Medicaid, SNAP, TANF, or Child Health Insurance Program (CHIP).	No (except Chicago)	Yes
Indiana	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	The state uses SNAP, TANF, foster care and English Language Learners for purposes of state education funding. However, in order to provide textbook fee waivers, CEP schools must still determine individual need which can be determined through a created form.	Yes	No
Iowa	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes
Kansas	Collect alternative income forms annually (required).	Yes	In order to receive At Risk state education funding, CEP schools are required to collect alternative income forms from students who are not directly certified. Counts are based only on free eligible students.	Yes	Yes
Kentucky	Collect alternative income forms annually (required)	Yes	In order to receive SEEK state education funding, CEP schools are required to collect alternative income forms.	Yes	Yes
Louisiana	Use most recent free and reduced price school meals data	Yes	CEP schools use the percentage of low income students they had in the last year that they collected free and reduced price meal applications for MFP state education funding.	No (except Pre-K)	Yes
Maine	Collect alternative income forms annually (required)	Yes	In order to receive EPS state education funding, CEP schools are required to collect alternative income forms. Schools have often adopted their own forms from Title forms for schools that do not provide school meals.	Yes	No

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Maryland	Use most recent free and reduced price school meals data	Yes	In order to receive state education funding, CEP schools use the percentage of low income students they had in the last year that they collected free and reduced price meal applications. Schools may also choose to collect alternative income forms instead.	No	No
Massachusetts	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	Yes	State education funding (Chapter 70) is provided based on count of "economically disadvantaged" students, now defined in all schools as students who receive one of the following programs or services: TAFDC (TANF), SNAP, MassHealth (Medicaid) or DCF Foster Care.	No	No
Michigan	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes
Minnesota	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes
Mississippi	All students in CEP schools considered free	Yes	All students in CEP schools are considered free for purposes of "at-risk" state education funding.	No	No
Missouri	Use most recent free and reduced price school meals data	Yes	CEP schools use the FRP percentage from the latest year available before CEP implementation. Schools can collect alternative income forms, but they are not required.	No	Yes
Montana	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Nebraska	Use Identified Student Percentage data x 1.1; or use most recent free school meals data	Yes	In order to receive state education funding, CEP schools multiply their identified student percentage by 1.1 to determine the number of free eligible students. Schools may also use data from the most recent school year in which school meal applications were collected if it would be higher. Schools may also develop and collect alternative income forms, but they are not required.	No	No
Nevada	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
New Hampshire	Collect alternative income forms annually (required)	Yes	In order to receive Adequate Aid state education funding, CEP schools are required to collect alternative income forms.	Yes	Yes
New Jersey	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes
New Mexico	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier.	No	No
New York	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes

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North Carolina	Unclear	Yes	CEP schools need to provide alternative procedures to determine the economic status of individual students (See slide 22: www.ncpublicschools.org/docs/program-monitoring/titleIA/community-eligibility/cep-breakfast-lunch.pdf), but more specific information is not available.	Unclear	Unclear
North Dakota	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier. For pre-K schools implementing CEP, alternative income forms are used.	No	No
Ohio	Collect alternative income forms annually (optional)	No	School meals data are not used to distribute state aid, but an optional alternative income form is supplied by the state to determine eligibility for various additional state and federal program benefits.	No	Yes
Oklahoma	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier.	No	No
Oregon	No use of free and reduced price data or similar in state funding formula	No	Alternative income forms available for use in CEP schools for determining individual benefits. Forms are optional.	No	Yes
Pennsylvania	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	School districts use poverty data (TANF, Census, Medicaid, children living in institutions for neglected or delinquent children, foster care) where necessary for state education funding. Schools can collect alternative income forms, but they are not required.	No	Yes
Rhode Island	Collect alternative income forms annually (required)	Yes	CEP schools conduct alternative family income surveys to determine individual low income need.	Yes	Yes
South Carolina	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	School districts identify low-income students as those who receive TANF, SNAP, Medicaid, or are in homeless, foster care, and migrant programs.	No	No
South Dakota	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Tennessee	Collect alternative income forms annually (required)	Yes	In order to receive BEP state education funding, CEP schools are required to collect alternative income forms.	Yes	Yes
Texas	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier for State Compensatory Education aid. School districts collect alternative income forms for a variety of other purposes as part of state legislation, but forms are not used to allocate SCE funding.	No	Yes

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Utah	No use of free and reduced price data or similar in state funding formula	No	Not applicable	No	No
Vermont	Collect alternative income forms annually (optional)	No	School meals data are not used to distribute state aid, but an optional alternative income form is supplied by the state to determine eligibility for various additional state and federal program benefits.	No	Yes
Virginia	Use data from other means-tested programs/sources (such as SNAP, TANF, Medicaid, or Head Start)	No	School divisions are not required to collect alternative income forms. For Title I accountability, VA DOE has issued a policy for CEP schools to count identified students as economically disadvantaged.	No	No
Washington	Collect alternative income forms annually (required)	Yes	Alternative income forms required each year in CEP schools.	Yes	Yes
West Virginia	Use Identified Student Percentage x 1.6	No	School meals data are not used to distribute state aid. CEP schools use the identified student percentage times the CEP multiplier to determine the "percent needy" for state or local purposes including Title I.	No	No
Wisconsin	Collect alternative income forms annually (required)	Yes	In order to receive SAGE state education funding, CEP schools are required to collect alternative income forms. School districts may use a modified version of the USDA application or a state-provided alternative household income form.	Yes	Yes
Wyoming	Use Identified Student Percentage x 1.6	Yes	Free and reduced price proxy generated using identified student percentage times CEP multiplier.	No	No

Note: If your state is shaded yellow, we were unable to determine your state's policies.

For any state corrections, additions, or revisions, please contact the Food Research & Action Center at 202-986-2200. Latest update: June 2017

