

Community Eligibility



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The Community Eligibility Provision: Alternatives to School Meal Applications

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“Community eligibility” is a powerful new tool to ensure that low-income children in high-poverty neighborhoods have access to healthy meals at school. Established in the Healthy, Hunger-Free Kids Act of 2010, community eligibility streamlines school meal operations and allows schools in high-poverty areas to offer nutritious breakfasts and lunches to all students at no charge.¹ One of the key simplifications of community eligibility is that participating schools no longer collect school meal applications. Eliminating applications reduces the administrative burden on school districts and reduces paperwork for parents struggling to put food on the table.

Without applications, schools need an alternative method to determine meal reimbursements. Under community eligibility, reimbursements are determined by a formula based on the percentage of “Identified Students” who are approved to receive free meals by means other than a household application, primarily children in households participating in the Supplemental Nutrition Assistance Program (SNAP) who are “directly certified” through data matching. This simplification eliminates the numerous hours that school administrators spend processing and verifying school meal applications. When school districts implement community eligibility, however, they no longer have the individual income data from those meal applications for the students attending community eligibility schools – data that programs outside of the school meal programs often use.

The U.S. Department of Agriculture (USDA) and the U.S. Department of Education (USED) have adopted policies so that individual income data is no longer needed for districts with community eligibility schools to participate in federal programs. But some states continue to require this data to determine state education funding allocations, and some districts choose to collect this data for other purposes, including monitoring student achievement or determining who receives waivers from school district fees. For example, some states target educational funding based on the percentage of students who are approved for free or reduced-price school meals. The funding is sometimes provided to the district on a per-student basis and/or the amount per-student is weighted based on the percentage of free and reduced-price eligible students in the district. Additionally, many states and school districts provide individual benefits for children who are approved for free or reduced price meals, such as eligibility for pre-school programs or transportation and fee waivers for testing, field trips, or textbooks.

For community eligibility schools, alternative data sources are available to meet these needs, and most states already implementing community eligibility have been able to implement it without requiring school districts to collect individual student income information. The positive experience of states and school districts that have implemented community eligibility demonstrates that while they can no longer use school meal application data to allocate funds, states and localities should not be dissuaded from adopting community eligibility.

Kentucky and Michigan have both offered community eligibility since the 2011-2012 school year and both had to require school districts with community eligibility schools to collect individual income data due to the way state education funding is allocated. Both states collected new income information forms from families without a negative impact on school funding. The popularity of community eligibility in these states has continued to grow even with the requirement that schools collect income information forms from students. During the 2012-2013 school year, 281 additional schools implemented community eligibility across the two states – an increase of 56 percent from the previous school year.

Targeting State and Local Resources to School Districts or Schools Without Collecting Individual Income Data

USDA and USED do not require schools to collect individual income data for any of their programs including Title I, E-rate, and the other child nutrition programs.² Instead, they rely on readily available alternative data for community eligibility schools. For example, to determine the share of students at a school that are considered low-income for purposes of allocating Title I funding among schools, districts can use a school's Identified Student Percentage or free claiming percentage (the Identified Student Percentage multiplied by 1.6), or another data source, such as Medicaid or Census data.³

States and localities can follow their lead. For allocating state or local funds *to districts or schools*, alternative data can be used in lieu of the income data collected on school meal applications. Some states use school meal eligibility data to allocate state or local education or other funds. In instances where the data are used to assess *a school or school district's poverty level*, the state can adopt the approaches allowed by USED for allocating Title I funds. These options are explained in the box below. For example, for purposes of allocating state education funding, the Texas Education Agency uses the count of students for whom meals are reimbursed at the free rate.⁴

Establishing a work group of staff from the school nutrition program and other relevant offices within the state education department can help identify and address any issues that may arise when school districts implement community eligibility and stop collecting school meal applications. This work group helps build open communication between programs, and is especially useful during the first year of implementation of community eligibility, but can continue beyond that to address questions that arise. For example, shortly after USDA selected Ohio to implement community eligibility, the state department of education convened an internal working group to bring together staff from programs that could be affected by community eligibility. The working group includes school nutrition, Title I, accountability, school funding, and assessment staff. The group meets regularly and considered how to adapt state funding formulas to incorporate community eligibility. States also can provide guidance and resources to school districts to help them navigate any effects of eliminating school meal applications. For example, Kentucky provided a memorandum to school district superintendents on data issues related to the state programs that might be affected by community eligibility.⁵

Alternative Data Sources to Assess a School's Poverty Level

- **The school's Identified Student Percentage:** This percentage relies on data from other need-based programs with rigorous eligibility determination processes. It is readily available for every school, whether the school offers community eligibility or not. It is important, however, that the Identified Student Percentage is used for all schools (whether or not they offer community eligibility) because Identified Students are always a subset of the students who would qualify for free or reduced-price meals if applications were taken.
- **The school's free claiming percentage under community eligibility (Identified Student Percentage * 1.6):** Although not an exact match, this percentage serves as a proxy for the share of students who would be certified for free or reduced-price meals if applications were still taken. Therefore the free claiming percentage for community eligibility schools can be compared to the percentage of students approved for free or reduced-price meals at other schools.
- **Medicaid data:** Nearly all children with incomes below 133 percent of the poverty line are eligible for Medicaid; implementation of the Affordable Care Act will increase the likelihood that they are enrolled. Medicaid data is already a permissible alternative to school meal applications for allocating Title I funds. When Medicaid receipt for a school's students can be determined, it is a reliable indicator of poverty.
- **Census data:** Census data are already a permissible alternative to school meal applications for allocating Title I funds within a school district. In addition, USDA commissioned the National Committee on Statistics to examine how Census data could be used as an alternative to applications for the school meal program. In areas where children primarily attend their neighborhood school, Census data for the relevant school attendance area is a reliable source of poverty data.

Targeting Resources to Students Without Collecting Individual Income Data

For purposes of monitoring educational progress or providing fee waivers to *individual students*, states or school districts can identify individual low-income students either by considering *all* students attending community eligibility schools to be low-income or by focusing on Identified Students. Either of these approaches can work well in the context of monitoring educational progress and both are allowed by USED in the context of the Title I accountability provisions.

Considering all students attending community eligibility schools to be low-income simplifies monitoring. Moreover, the vast majority of students at community eligibility schools who would not have met the strict criteria for free or reduced-price school meals are nonetheless low-income. If school districts wish to monitor the progress of the very lowest-income and most vulnerable students, focusing on Identified Students works well, as these data are available for all schools regardless of whether they have adopted community eligibility.

The best approach to determine which students receive a fee waiver or other individual benefit is to provide the waiver to all children at community eligibility schools. While doing so could increase costs, providing waivers or benefits only to Identified Students would result in children who were receiving such benefits before the adoption of community eligibility losing them because they are from low-income households but are not Identified Students. Some of these children are just as poor as Identified Students. Moreover, as noted above, the vast majority of students at community eligibility schools are likely to be from families that are struggling financially.

Collecting Individual Income Data Outside the School Meal Program

The majority of states and that have implemented community eligibility have eliminated the collection of individual student income data. Those states or school districts that cannot operate without individual student income data due to state statutes, or do not wish to delay implementation of community eligibility until they adopt alternative methods for directing resources to economically disadvantaged students, can collect those data outside the school meal program. In most states that have implemented community eligibility, school districts decide whether to collect individual income data, and some states provide a model family income collection form.⁶ Community eligibility schools, however, may not collect school meal applications or use funds from the school nutrition account to collect individual income data.⁷

Income data collected outside the school meal program may be used in the aggregate to target state or local funding, and individual data may be used to provide fee waivers or other services to individual students. Some states and districts have implemented alternative data collection processes that allow them to participate in community eligibility without any negative impacts on state funding. Some districts report a higher success rate of data collection with alternative forms because they are simpler, do not require information about a Social Security number, and can be included with mandatory registration forms that parents complete annually. Areas interested in implementing alternative income data collection processes need to make several key decisions.

- **Who handles the alternative income collection forms.** In many community eligibility schools that collect alternative income forms, staff not associated with the school meal programs collect and process the forms. By contrast, in Detroit, Michigan, school nutrition staff still collect and process the forms but the cost of the data collection is covered by the school district rather than the school nutrition program.
- **Whether forms are distributed to all parents.** Some school districts distribute alternative income forms only for children who are not Identified Students (students living in a household receiving SNAP, Temporary Assistance for Needy Families cash assistance, or Food Distribution Program on Indian Reservation benefits, or students who are in foster care, migrant, homeless, or enrolled in Head Start.) For example, Detroit, Michigan; Buffalo, New York; and Rochester, New York, use this approach. As a result, they seek to collect alternative income forms only from about one-third of their families.
- **Whether the form can be simplified.** The federal rules about what must be included on a school meal application do not apply to these alternative data forms. Creating the new form gives school districts the opportunity to develop a clearer form that families may feel more comfortable completing. For example, some families are reluctant to share information about a Social Security number and the new form does not need to ask for that.
- **Whether the forms are mandatory or optional for parents.** While parents cannot be required to submit school meal applications, states or school districts can make their own determination about whether to require alternative income forms as a condition of enrollment. If submitting an income form is required, it is important to provide a way for parents with language or literacy barriers, as well as those with no income, to complete the form. Even when parents are not required to submit the form, school districts have been able to collect forms successfully from the vast majority of parents. In Floyd County, Kentucky, for example, 98 percent of the forms were returned the first year they were used. Likewise, the Chicago Public Schools achieved a 98 percent return rate. Detroit, Michigan, adapted strategies originally devised to increase submissions of school meal applications to increase submissions of the alternative forms. In Rochester, New York, the district engaged principals and explained to parents how the data would help their child's school.

Conclusion

Community eligibility allows high-poverty schools to offer school meals at no charge to all students while streamlining school meal program operations, including eliminating school meal applications, which many states and localities have used as the basis for distributing resources to schools and students. In the absence of applications, districts that offer community eligibility in some or all schools and depend on income data to determine funding for other programs must identify alternative data sources, which are readily available. The U.S. Departments of Education and Agriculture no longer require data from school meal applications – or any individual income data – for any of their programs. States and school districts can access the data they need by using school meals data that remain available to districts with community eligibility schools or data from outside the meal programs, such as Medicaid data.

It is critical that states and school districts identify alternatives to data from meal applications so that high-poverty schools that adopt community eligibility to feed more students are not disadvantaged in any other context. Likewise, it is critical that a desire for data traditionally gathered from meal applications does not stand in the way of districts and schools implementing community eligibility, which can help support educational achievement, reduce hunger, and improve children's nutrition and health.

¹ For a more detailed explanation of community eligibility and the benefits for school districts that have adopted it, see Center on Budget and Policy Priorities and Food Research and Action Center, “Community Eligibility: Making High-Poverty Schools Hunger Free,” October 1, 2013, http://frac.org/pdf/community_eligibility_report_2013.pdf.

² For an explanation of USED's Title I policies for community eligibility schools see Zoë Neuberger and Wayne Riddle, “How to Identify Low-Income Students in “Community Eligibility” Schools for Title I Purposes,” Center on Budget and Policy Priorities, June 2, 2014, <http://www.cbpp.org/cms/index.cfm?fa=view&id=4152>.

³ Community eligibility schools are not required to find their Identified Students each year, but would benefit from doing so because their free reimbursement percentage could increase, it can help their state meet direct certification performance benchmarks, and it would allow them to use the data for purposes outside the meals programs.

⁴ See Texas Education Agency guidance letter, April 4, 2014, <http://www.squaremeals.org/Portals/8/files/NSLP/CEP%20Guidance%20Letter-1.doc>.

⁵ “Data Collection Responsibilities with the Community Eligibility Option,” Kentucky Department of Education, July 22, 2011, <http://education.ky.gov/federal/SCN/Documents/Guidance%20on%20Data%20Collection%20for%20the%20Community%20Eligibility%20Option%20Final%20HD%207-22-11.doc>.

⁶ For example, the California Department of Education developed five different versions of an alternative form so districts could choose the one best suited to their needs and translated each version into 11 languages. See the Household Income Data Collection Forms at <http://www.cde.ca.gov/fg/aa/lc/lcfaq.asp#PROV2and3>.

⁷ See 42 U.S.C. 1759a(a)(1)(F)(vi).