



**TOWARD AN ACCURATE COUNT OF LOW-INCOME STUDENTS**

**Statement of  
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**before the  
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\*The views expressed are my own and should not be attributed to the Urban Institute, its trustees, or its funders.

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For decades, student free and reduced-price lunch (FRPL) status has been a proxy measure for student poverty, both in Connecticut and throughout the country. This measure has been used both for test-based accountability and for funding. In Connecticut, school funding is distributed to districts in part based on the share of FRPL-eligible students in a given district.<sup>1</sup> Similarly, Connecticut sets long-term goals for the academic achievement and growth of its FRPL-eligible students.<sup>2</sup>

But changes to the National School Lunch Program (NSLP) have made FRPL status less useful as a proxy measure of poverty. Connecticut's proposed bill no. 6827 would revise the definition of "FRPL-eligible" to count students who are directly certified as eligible, offering the promise of a more accurate count of low-income students for purposes of the education cost sharing grant formula.<sup>3</sup> In my testimony today, I hope to provide some insight into this change and why it is one many states have made or are making.

### **The waning utility of FRPL counts**

Since 1946, the NSLP has provided school meals to low-income children. Schools were given resources to collect household income eligibility forms, which had the added benefit of providing policymakers a uniform measure of student poverty. This measure was never perfect, but it was good and widely used.<sup>4</sup>

In the 2014–15 school year, however, policy changes expanded the use of the Community Eligibility Provision (CEP) nationwide. The CEP provides free meals to all students in schools or districts where at least 40 percent of students are found eligible by virtue of participation in other public benefit programs, such as the Supplemental Nutrition Assistance Program (SNAP), or their status as homeless or runaway children. The share of students directly certified through the use of select public benefits, or by circumstances such as homelessness or foster care, is known as the Identified Student Percentage (ISP).<sup>5</sup> This means that in a district or school with an ISP of at least 40 percent, for example, all students may receive free lunch, even those who come from high-income families.

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<sup>1</sup> Marybeth Sullivan, "Education Cost Sharing Grant Formula" (Hartford: Connecticut General Assembly, Office of Legislative Research, 2018), <https://www.cga.ct.gov/2017/rpt/pdf/2017-R-0001.pdf>.

<sup>2</sup> US Department of Education, *Connecticut Consolidated State Plan under the Every Student Succeeds Act* (Washington, DC: US Department of Education, 2017), <https://www2.ed.gov/admins/lead/account/stateplan17/ctconsostateplan.pdf>.

<sup>3</sup> See the proposed rule here: <https://www.cga.ct.gov/2019/TOB/h/pdf/2019HB-06827-R00-HB.PDF>.

<sup>4</sup> Thurston Domina, Nikolas Pharris-Ciurej, Andrew M. Penner, Emily K. Penner, Quentin Brummet, Sonya R. Porter, and Tanya Sanabria, "Is Free and Reduced-Price Lunch a Valid Measure of Educational Disadvantage?" *Educational Researcher* 47, no. 9 (September 2018): 539; Michael Harwell and Brandon LeBeau, "Student Eligibility for a Free Lunch as an SES Measure in Education Research," *Education Researcher* 39, no. 2 (2010): 120, <https://journals.sagepub.com/doi/pdf/10.3102/0013189X10362578>; Katherine Micheltore and Susan Dynarski, "The Gap within the Gap: Using Longitudinal Data to Understand Income Differences in Educational Outcomes," *AERA Open* 3, no. 1 (February 2017): 1.

<sup>5</sup> "Worksheet for LEAs: Calculating the Identified Student Percentage" (Washington, DC: US Department of Education, Food and Nutrition Service, 2015), <https://fns-prod.azureedge.net/sites/default/files/cn/SP15-2016av2.pdf>.

In Connecticut, CEP schools and districts are required to collect Alternative Income Survey data to capture information for incoming students who are not part of the ISP.<sup>6</sup> But without the incentive of school meals and resources for data collection, implementation of this requirement may be uneven. Further, because students retain their individual FRPL status from prior years, counts of students in poverty could be inaccurate or outdated.<sup>7</sup>

The benefits of the CEP are many: it reduces the paperwork burden on families and schools and ensures that all students in need have access to a free lunch, regardless of whether their family filled out a form. Additionally, if all students at a school have access to free lunch, it reduces the stigma for those who need it. And emerging evidence suggests that the CEP may improve student behavior.<sup>8</sup>

But expanding use of the CEP has made FRPL status no longer viable as a proxy for income. In 2016–17, 20,721 schools in 3,528 districts participated in the CEP. This means that more than 9.7 million children had the option to receive free lunch but may not have accurate information on family income included in administrative databases.<sup>9</sup> In the same year, I estimate that roughly 200 of these CEP schools—and more than 100,000 of these children—were in Connecticut.<sup>10</sup> Participation has grown since then.<sup>11</sup>

### Alternatives to FRPL

As FRPL grows better for students but worse for those who need an accurate count of low-income students, what are the possible solutions?

As my colleague Tomas Monarrez has outlined, using neighborhood economic information is a poor stand-in for FRPL status.<sup>12</sup> His analysis of American Community Survey data shows that geographic measures of poverty are most likely to be inaccurate in the communities with the most low-income students, as measured by FRPL. They are also likely to be inaccurate in communities of color.

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<sup>6</sup> Donna Heins, Teri Dandeneau, Dave Donovan, Lonnie Burt, and Shari-Lynn Staeb, “Community Eligibility Provision (CEP): Go for the Gold!” (Hartford: Connecticut State Department of Education, 2018), <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPpresentationCSDE.pdf>; “Alternative Approaches to Using School Meals Data in Community Eligibility (CEP) Schools,” Food Research and Action Center, accessed February 18, 2019, <http://frac.org/wp-content/uploads/cep-state-education-data-policies.pdf>.

<sup>7</sup> See the 2017–18 Alternative Income Survey at [https://portal.ct.gov/-/media/SDE/Performance/Data-Collection/Help-Sites/PSIS/CEP/CEP\\_AlternativeIncomeSurvey.pdf?la=en](https://portal.ct.gov/-/media/SDE/Performance/Data-Collection/Help-Sites/PSIS/CEP/CEP_AlternativeIncomeSurvey.pdf?la=en).

<sup>8</sup> Nora E. Gordon and Krista J. Ruffini, *School Nutrition and Student Discipline: Effects of Schoolwide Free Meals* (Cambridge, MA: National Bureau of Economic Research, 2018), <https://www.nber.org/papers/w24986>.

<sup>9</sup> Jessie Hewins, Randy Rosso, and Alison Maurice, *Community Eligibility Continues to Grow in the 2016–2017 School Year* (Washington, DC: Food Research and Action Center, 2017), [http://www.frac.org/wp-content/uploads/CEP-Report\\_Final\\_Links\\_032317.pdf](http://www.frac.org/wp-content/uploads/CEP-Report_Final_Links_032317.pdf).

<sup>10</sup> Author’s calculations using 2016–17 Common Core of Data Membership and School Characteristics files. See “Public Elementary/Secondary School Universe Survey Data,” US Department of Education, Institute of Education Sciences, National Center for Education Statistics, accessed February 15, 2019, <https://nces.ed.gov/ccd/pubschuniv.asp>.

<sup>11</sup> “Community Eligibility Provision (CEP), Participating Districts and Schools, School Year 2018–19,” Connecticut State Department of Education, accessed February 15, 2019, <https://portal.ct.gov/-/media/SDE/Nutrition/CEP/CEPSchoolsList.pdf?la=en>.

<sup>12</sup> Tomas Monarrez, “Can We Measure Student Economic Disadvantage Using Geographic Data on Income and Poverty,” *Urban Wire* (blog), Urban Institute, November 14, 2018, <https://www.urban.org/urban-wire/can-we-measure-student-economic-disadvantage-using-geographic-data-income-and-poverty>.

A more promising alternative for counting low-income students, and one being used in several states, is direct certification.<sup>13</sup> Direct certification—part of the method states use to determine community eligibility—links school rosters with public benefit program data to identify students from low-income families who participate in SNAP, Temporary Assistance for Needy Families (TANF), or other benefit programs. As my colleague Kristin Blagg found, 3 states and the District of Columbia reported only counts of directly certified students to the US Department of Education in 2016–17, while schools in 17 states reported both direct certification counts and FRPL counts. Twenty-seven states reported only FRPL counts, and the other three reported different measures for different schools.<sup>14</sup>

### **Direct certification**

Connecticut already uses direct certification to determine which students are eligible for FRPL. (In fact, Connecticut has one of the strongest direct certification processes, with 100 percent of school-age SNAP participant children directly certified for free meals in the 2014–15 school year.<sup>15</sup>) Students who are enrolled in SNAP, TANF, state- or federally funded Head Start programs or, beginning in 2018, those who receive free HUSKY A and whose families earn below 130 percent of the FPL are directly certified as eligible for no-cost school meals in Connecticut.<sup>16</sup> The number of students identified through these programs, combined with students in special circumstances, makes up the ISP, the number used to determine whether a school or district is eligible for the CEP. (In addition, children whose families earn between 130 and 185 percent of the FPL are directly certified for reduced-price meals but are not counted toward CEP eligibility.)

Direct certification may not identify all low-income students, and Alternative Income Surveys are limited in their ability bridge the gap. For example, two schools might each directly certify 45 percent of students but identify different shares of students as low-income based on Alternative Income Survey forms. School A may collect forms from an additional 5 percent of students, all of whom are low income, while School B may collect forms from an additional 20 percent of students and identify 15 percent of these students as low income. These schools would have different shares of students identified as FRPL—50 percent in School A, and 60 percent in School B—but would be considered to have similar levels of student need if only direct certification were used.

### **Getting an accurate count of low-income students**

Direct certification provides an accurate but potentially incomplete count of low-income students in a given school, school district, or state. The challenge is to identify which students are missing and how to recapture them in measures that can be used for school and district funding or to adjust funding mechanisms to

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<sup>13</sup> “Alternative Approaches to Using School Meals Data,” Food Research and Action Center.

<sup>14</sup> Kristin Blagg, “Which Students Count as Low Income? New National Data Shine Light on Proxy for Poverty,” *Urban Wire* (blog), Urban Institute, January 25, 2019, <https://www.urban.org/urban-wire/which-students-count-low-income-new-national-data-shine-light-proxy-poverty>.

<sup>15</sup> Quinn Moore, Kevin Conway, Brandon Kyler, and Andrew Gothro, *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2014–2015* (Princeton, NJ: Mathematica Policy Research, 2016), <https://www.mathematica-mpr.com/our-publications-and-findings/publications/direct-certification-nslp-state-implementation-school-year-2014-2015>.

<sup>16</sup> Connecticut School Finance Project, “Updating How Connecticut Counts Low-Income Students” (New Haven: Connecticut School Finance Project, n.d.), <http://ctschoolfinance.org/assets/uploads/files/Updating-How-CT-Counts-Low-income-Students.pdf>.

account for this possibility. Low-income students and families who do not or cannot take up public benefits despite being income-eligible, such as students from noncitizen families,<sup>17</sup> are among those most likely to be missed.

One promising approach is to expand the constellation of public benefit programs that are included.<sup>18</sup> Massachusetts takes this approach.<sup>19</sup> Massachusetts also changed the way it allocates funding for low-income students in its formula, assigning districts to deciles based on share of economically disadvantaged students and providing more funds for increased concentrations of poverty.<sup>20</sup> States can also ease the transition using hold-harmless provisions to ensure that districts do not receive less funding than what they received in the prior year.

Another option is to use a multiplier or weight to recapture missing students in school- and district-level measures of student poverty. Baltimore City Public Schools uses an additional weight for English language learners based on evidence that schools with large Hispanic populations were unable to identify many low-income students through direct certification.<sup>21</sup>

If Connecticut wished to retain the use of Alternative Income Survey data, another approach would be to provide additional resources for the data collection. Annual collection of simple forms, translated into multiple languages, can help inform an accurate count of low-income students. But families, schools, and districts may need incentives to implement this kind of data collection in ways that more accurately identify low-income students.

As Connecticut considers changes to how it counts low-income students, it could look to other states that have moved away from FRPL and explored direct certification as a means to identify economically disadvantaged students.<sup>22</sup> Research suggests increased spending on education can improve student

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<sup>17</sup> Alison Siskind, "Noncitizen Eligibility for Federal Public Assistance: Policy Overview" (Washington, DC: Congressional Research Service, 2016), <https://fas.org/sgp/crs/misc/RL33809.pdf>.

<sup>18</sup> Erica Greenberg, "New Measures of Student Poverty: Replacing Free and Reduced-Price Lunch Status Based on Household Forms with Direct Certification" (Washington, DC: Urban Institute, 2018), <https://www.urban.org/research/publication/new-measures-student-poverty>.

<sup>19</sup> "Redefining Low Income: A New Metric for K–12 Education Data," Massachusetts Department of Elementary and Secondary Education, last updated July 16, 2015, <http://www.doe.mass.edu/infoservices/data/ed.html>; Nancy Wagman, "Direct Certification for School Meals: Feeding Students, Counting Kids, Funding Schools," Massachusetts Budget and Policy Center, February 17, 2016, [http://massbudget.org/report\\_window.php?loc=Direct-Certification.html](http://massbudget.org/report_window.php?loc=Direct-Certification.html); "Office of Food and Nutrition Programs: Community Eligibility Provision," Massachusetts Department of Elementary and Secondary Education, last updated June 4, 2018, <http://www.doe.mass.edu/cnp/nprograms/cep/>.

<sup>20</sup> MDESE (Massachusetts Department of Elementary and Secondary Education), "A Changing Metric: Low Income versus Economically Disadvantaged" (Malden: MDESE, 2015), <http://www.doe.mass.edu/infoservices/data/ChangingMetric.pdf>; Luc Shuster, "Proposed Low-Income Student Changes Would Have Varied Chapter 70 Impact," Massachusetts Budget and Policy Center, February 17, 2016, [http://www.massbudget.org/report\\_window.php?loc=Analyzing-Low-Income-Chapter-70-Changes.html](http://www.massbudget.org/report_window.php?loc=Analyzing-Low-Income-Chapter-70-Changes.html).

<sup>21</sup> Romona Carrico, Amir François, and Christopher Wohn, *Problem, Research, Action: Poverty Measurement Transition in Baltimore City Public Schools* (Baltimore: Baltimore City Public Schools, 2018), [https://mldscenter.maryland.gov/egov/Publications/ResearchSeries/2018/ProbResAct\\_PovertyMeasurementTransitionBCPSS.pdf](https://mldscenter.maryland.gov/egov/Publications/ResearchSeries/2018/ProbResAct_PovertyMeasurementTransitionBCPSS.pdf).

<sup>22</sup> Delaware provides another state example for review. See "Fall 2014–Low Income Measure," Delaware Department of Education, last updated December 5, 2016, <https://www.doe.k12.de.us/Page/1890>.

outcomes, especially among low-income students.<sup>23</sup> Targeted increases in funding could narrow the achievement gap between poor and nonpoor students.<sup>24</sup> Having an accurate count of students in need is critical to ensuring students get the resources they deserve.

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<sup>23</sup> Joshua Hyman, "Does Money Matter in the Long Run? Effects of School Spending on Educational Attainment," *American Economic Journal: Economic Policy* 9, no. 4 (November 2017): 256; C. Kirabo Jackson, Rucker C. Johnson, and Claudia Persico, "The Effects of School Spending on Educational and Economic Outcomes: Evidence from School Finance Reforms" *Quarterly Journal of Economics* 131, no. 1 (February 2016): 157; Christopher A. Candelaria and Kenneth A. Shores, "Court-Ordered Finance Reforms in the Adequacy Era: Heterogeneous Causal Effects and Sensitivity," *Education Finance and Policy* 14, no. 1 (Winter 2019): 31.

<sup>24</sup> Matthew Chingos and Kristin Blagg, "School Funding: Do Poor Kids Get Their Fair Share?" Urban Institute, accessed February 15, 2019, <http://apps.urban.org/features/school-funding-do-poor-kids-get-fair-share/>.