
POVERTY MEASURES IN NEW YORK STATE SCHOOL AID FORMULAS – CHAPTER 54 REPORT

EXECUTIVE SUMMARY

Free and Reduced Price Lunch (FRPL) data are an important measure of student socioeconomic status, and a key component of the Extraordinary Needs Count, which adjusts Foundation Aid per pupil.¹ In this context FRPL data acts as a proxy for student need. Since 2013, FRPL has been collected on a student-by-student basis through the Student Information Repository System (SIRS), having been collected previously through Basic Education Data System (BEDS) forms. In order to submit this data to the New York State Education Department (NYSED), school districts use the eligibility data (direct certification in other anti-poverty programs, household application for free or reduced price meals/milk) collected annually by the school foodservice personnel to qualify individual students for free or reduced price meals.

Chapter 54 of the Laws of 2016 authorizes and directs the Commissioner of Education to examine Free and Reduced Price Lunch (FRPL) counts used in state aid formulas, as they are affected by the federal Community Eligibility Provision (CEP), as well as other reliable measures of student poverty, and issue a report with recommendations by October 1, 2016. This report satisfies such requirement.

CEP allows schools and districts in high poverty areas to provide free breakfast and lunch to all students without collecting and processing school meal applications. The U.S. Department of Agriculture (USDA) phased in CEP over three years, beginning with a pilot of 10 states and the District of Columbia, including New York State, beginning in the 2011-12 school year. In the 2015-16 school year, approximately fifty school districts in New York State had some or all schools participating in CEP.

Schools participating in CEP are prohibited by USDA to collect the household application for free or reduced price meals/milk, which greatly impacts the quality of data for use in the Foundation Aid formula. To address the need for continuing to collect household income data in CEP schools and districts, NYSED makes available an alternate Family Income Inquiry form. Despite their use, there is no incentive for the family to return the form as the student(s) is receiving all meals at no charge under CEP.

¹ Foundation Aid is often described as having “four moving parts,” one of which is student need. Student need is included in the Foundation Aid formula through the Extraordinary Needs Count, which includes weightings for students who are eligible for FRPL, 2000 Census poverty rates, English language learner enrollments, and a count of students in areas with low population density (sparsity).

The voluntary nature of these alternate income forms has led to concerns about lower response rates within CEP schools and districts and the subsequent underreporting of student need in these districts. It would be counterproductive if undercounting FRPL students in CEP schools negatively affected measures of student need, and thus their potential state aid levels more adversely than non-CEP schools, when CEP is intended to help these schools and students. Current FRPL data may also suffer from undercounting in non-CEP districts and schools where the application is used, as it is a count of eligible applicants rather than eligible students. However, schools are not reimbursed for free or reduced price meals provided to students without this application, which may limit underreporting.

With that background in mind, the analysis conducted within this report attempted to achieve three main goals:

1. Develop a series of recommendations that appropriately measures student poverty within all districts across New York state, including both participants and nonparticipants in the CEP program;
2. Ensure that such recommendations minimize the additional collection and reporting burdens on school districts above and beyond what is currently required for the FRPL program; and
3. Limit the disruptive nature of a change in formulaic data elements, recognizing that some change is inevitable but that replacement data items should not result in drastically different Foundation Aid outcomes for impacted school districts.

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OPTIONS FOR REPLACING FRPL DATA IN CEP SCHOOLS AND DISTRICTS

A variety of alternatives and adjustments to address the negative impact of reduced FRPL data on student need-driven state aid formulas are presented below. Three primary characteristics are analyzed for each option: burden, credibility, and distribution. **Burden** represents data availability, difficulty collecting the data, and effort required of parents and school administrators. **Credibility** assesses known or suspected biases and concerns with the methodology. **Distribution** seeks to reference the size of the shift from existing FRPL data.

In reviewing funding mechanisms from other states, 39 states provide some sort of additional funding for low-income or at-risk students, and 29 states use free or reduced price lunch data in aid formulas (Verstegen, 2015), (Croninger, King Rice, & Checovich, 2015). Other states use measures such as direct measures of income; Title I counts; federal Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Medicaid participation; U.S. Census poverty data; and a few states use the new Direct Certification Rates as used in the CEP.

I. BLENDED APPROACHES

One option for replacing FRPL data in CEP schools is to substitute another measure for FRPL in those schools. Approaches A and B below are the most widely used methods other states employ for this purpose.

A. BLENDED APPROACH – FORMS FOR CEP SCHOOLS

Currently, NYSED makes available an alternate income forms (Family Income Inquiry form) to schools and districts participating in CEP to use to collect family income data (see [Appendix D: Sample CEP Income Eligibility Form](#)). This is an annual form, but NYSED takes a number of steps to minimize the burden imposed on school administration and families. NYSED guidance suggests that the form is given only to students who are not Identified Students,² and thus excludes students who are otherwise automatically eligible for free lunch. The state income forms in use are often somewhat simpler than the federal free or reduced price meal form, although any change in forms can make it more difficult for parents to fill out the new forms correctly (see [Appendix C: Sample Federal Student Meal Application Form](#)). This option is the most consistent with historical data and the most granular, collected at the student level.

Using income form data has raised a few concerns. First, the data may underreport FRPL rates in CEP schools and districts with lower response rates. Anecdotally, staff has heard from districts and advocates that parents of students in schools participating in CEP are not completing

² Pursuant to federal regulations, “Identified Students” are students who are directly certified for free school meals include students participating in the federal SNAP, TANF, Food Distribution Program on Indian Reservations, participants in Federal Head Start programs, or students with a homeless, migrant, runaway, or foster child status.

these forms at the same rate as FRPL forms, because the forms are not necessary to secure meals for the students. Second, FRPL data may not accurately differentiate between students who are economically disadvantaged and those who are not, and may over represent student need (Cowan, et al., 2012). In New York State, the 3-year average K-6 FRPL rate is 52.34%, meaning a majority of K-6 students are included in the “extraordinary needs” count in state aid formulas with an additional weighting.

Replacing FRPL form data with income form data in CEP schools is a familiar method and several other states use this method. It is reasonably transparent and preserves student level indicators of need.

Burden	Credibility	Distribution
This system is currently in place. Requires parents to fill out alternate forms in CEP schools, but NYSED has sought to minimize this burden.	May have lower response rates in CEP schools and districts and underreport these low-income students. This measure mixes FRPL data with income form data. Some studies suggest FRPL data over represents student need.	No shift in distribution - current use in formulas.

Tennessee, Kentucky and Michigan also collect student income forms each year for CEP schools and FRPL forms from non-CEP schools (Tennessee Department of Education, 2014), (Desai, 2011), (School Nutrition Programs Michigan Department of Education, 2016). Washington State has also released an annual survey for all students attending CEP schools (State of Washington Office of Superintendent of Public Instruction, 2016).

B. BLENDED APPROACH – DIRECT CERTIFICATION FOR CEP SCHOOLS

One alternative to collecting income data in CEP schools and districts would be to use the direct certification data as a proportion of total enrollment, and apply a multiplier to make these rates roughly comparable to FRPL rates in non-CEP schools. Federal CEP implementation guidance suggests a multiplier of 1.6, which is the free lunch reimbursement rate for CEP schools (U.S. Department of Education Office of Elementary and Secondary Education, 2015). This multiplier was chosen by USDOE to represent the national average of expected FRPL eligible students compared to direct certification students. The USDA has flexibility to change the multiplier anywhere between 1.3 and 1.6 through a regulatory process. Assuming a cap at 100%, the impact of this multiplier will flatten out once the direct certification rate reaches 62.5% for a school or district, since the 1.6 multiplier would push any district with more than 62.5% students directly certified to over 100%, which would limit differentiation among the neediest districts. The latter is a disadvantage of this approach.

The NYSED Child Nutrition Program Office began collecting Medicaid and SNAP participation for all schools and districts during the 2015-16 school year. This data will be referred to as “direct certification” data throughout this report, as students participating in Medicaid and SNAP are automatically eligible for school meal programs. Medicaid and SNAP participation counts are a subset of direct certification counts, but the largest subset. Students qualifying for direct certification under Food Distribution Program on Indian Reservations, Head Start participation,

homeless, migrant, runaway, or foster child status are often Medicaid or SNAP eligible as well. While districts only need to update this data at the start of each four-year CEP cycle for each school, group of schools, or district, the Child Nutrition Office began collecting direct certification data on a yearly basis for the 2015-16 school year, consistent with yearly collection of FRPL data.

FRPL data is gathered in Student Information Repository System (SIRS) and Medicaid/SNAP participation is gathered through the Office of Child Nutrition. Additionally, Child Nutrition data counts “feeding sites” separately from primary school locations, whereas SIRS data consolidates school numbers to the primary school location. As a result of the different collection processes, the data cannot be blended cleanly, and it would not be preferable to combine datasets for a hybrid measure.

Additionally, direct certification data are generated by participation in a variety of federal benefit programs. Participation rates in federal benefit programs are not consistent across states, regions, or districts. For example, SNAP participation rates for eligible individuals tend to be higher in rural areas than urban areas (Elsami, Filion, & Strayer, 2011).

Burden	Credibility	Distribution
No additional burden on school administration or parents.	Mixing FRPL data in non-CEP schools with weighted direct certification data in CEP schools will never be exactly equivalent. FRPL data and CEP data are updated yearly but do not mix cleanly, and are not complete for all districts. Multiplier flattens out economic need among any district with aggregate 62.5% direct certification rate or greater.	Minimal statewide shift with some significant impact in individual districts.

West Virginia (West Virginia Department of Education, 2014), North Carolina (North Carolina Department of Public Instruction, 2014), and Florida (Florida Department of Education, 2014) blend direct certification data from CEP schools with FRPL data to determine school level Title I funding levels. In North Carolina and Florida, districts with both CEP schools and non-CEP schools can choose whether to use direct certification data or FRPL data for their non-CEP schools.

C. FREEZE CURRENT DATA

Another alternative would be to freeze existing FRPL data at a point in time, for either CEP schools or all schools. Freezing FRPL for only CEP schools would be a blended approach, whereas freezing for all schools could be an alternative. A related option would be to offer a “hold harmless” option for CEP districts. In this case, districts with at least one CEP school would get the greater of current FRPL or FRPL at the time CEP was implemented in the district.

School aid formulas currently use a variety of frozen data. Some of these freezes have caused concern in that they have negatively affected the accuracy of formula outputs in terms of meeting current needs. Picking a particular dataset to freeze is also problematic, as CEP districts are already impacted by FRPL undercounts. In some districts, students may become relatively less needy over time, and a freeze would continue providing a benefit where it is not necessary.

Burden	Credibility	Distribution
No additional burden.	Acceptable now, but diminishing over time.	Maintains the current or any prior distribution.

Connecticut freezes prior year FRPL eligibility status for returning non-identified students and uses an alternative income survey for new non-identified students at CEP schools (Russell-Tucker, 2014).

II. ALTERNATIVES TO FRPL DATA

Instead of patching in comparable data for CEP schools and districts, the FRPL measure could be replaced entirely. FRPL is just one proxy for economically disadvantaged students, and alternative proxies for student need are available.

D. NEW DEPARTMENT OF TAXATION AND FINANCE DATA

The Department of Taxation and Finance currently provides income data by school district to NYSED. These income data include aggregate total number of tax returns, taxpayers, adjusted gross income, and tax liability. The Department of Taxation and Finance also provides summary data for average and median income by district. None of these data are sufficient to determine the proportion of economically disadvantaged school age students in a district, as they do not reveal information about income distribution. However, raw tax return level data include adjusted gross income, number of dependents, and school district coding, which is sufficient to calculate an actual poverty or low income rate.

Although calculation of a poverty rate or low-income rate for households with school-age dependents is theoretically possible, only the Department of Taxation and Finance would know if this is actually possible, and what sort of implementation timeframe would be feasible. Relying on another agency—state or federal—to calculate these data points would limit NYSED’s ability to inspect, dispute, and revise data when inconsistencies arise.

Other concerns are that these data do not differentiate between students enrolled in public and nonpublic schools, the data only include taxpayers and thus exclude needy students from households that do not pay taxes, and the data are not specific to parents or families with children. Districts with significant retirement communities or other groups of childless taxpayers could expect bias in these figures. Additionally, districts with large groups of non-filing families could expect an underestimation of their student need, and thus a smaller allocation of state aid.

Burden	Credibility	Distribution
No additional burden on parents; unknown additional burden on Department of Taxation and Finance and NYSED.	Does not count any residents who do not file taxes, who tend to be those with the lowest incomes and the most in need. Direct data from tax forms, but includes all filing residents, not just public students (or households with public students), which could create bias in districts with large and economically indistinguishable nonpublic populations. May have issues with central high school districts and New York City boroughs.	Unknown.

E. DERIVED DEPARTMENT OF TAXATION AND FINANCE DATA

Alternatively, the Department of Taxation and Finance currently provides NYSED with data on median income by district and data sufficient to calculate average income by district. The Alternate Pupil Wealth Ratio (APWR) used in school aid formulas is equal to adjusted gross income (AGI) divided by total wealth pupil units (TWPU)³ all divided by the state average AGI/TWPU. This ratio is a component of Combined Wealth Ratio (CWR), which is currently used in a variety of aids, including Foundation Aid. The APWR range is very different from the FRPL range of between 0% and 100%. APWR ranges from a high of 8.442 in Oyster Bay to a low of 0.188 in Salmon River.⁴ This APWR measure would need to be scaled to generate a range of values that is comparable with that of FRPL data.

APWR reflects an average income per pupil in a district, compared to the same statewide. Averages are skewed by high outliers, particularly on a district level. The Department of Taxation and Finance also provides median income, which is less skewed by outliers. NYSED could use these data to construct an index similar to APWR but without the high outlier bias. NYSED would need to request median income for New York City and each central high school, as the Department of Taxation and Finance currently only provides data by borough and component districts.

This type of constructed measure suffers from all the problems described above; additionally these data would not reveal information about the distribution of incomes. For example, if a district was majority middle class but had a significant subpopulation with lower socioeconomic status, median income may not reflect this needy subset.

³ TWPU is a pupil count that is the sum of a district's Average Daily attendance for the year prior to the base year, the full time equivalent (FTE) enrollment of resident pupils attending public school elsewhere less the FTE enrollment of nonresident pupils and the FTE enrollment of resident pupils with disabilities attending full time in BOCES, as well as additional counts and weightings.

⁴ Data as set forth for each school district as "ALTERNATE PUPIL WEALTH RATIO (APWR)" in the school aid computer listing produced by the commissioner in support of the Enacted Budget for the 2016-17 school year and entitled "SA161-7."

Burden	Credibility	Distribution
No additional burden on parents or the Department of Taxation and Finance. Data is already available.	Using a single point in a population is less representative than the population as a whole. Would require significant adjustments in formulas to accommodate the change from FRPL. May have issues with central high school districts and New York City. Does not count non-filing residents and includes households without public students.	Unknown.

F. FEDERAL CENSUS POVERTY RATE

Another alternative could be to replace FRPL data with federal poverty data to approximate economically disadvantaged students. Each year, the U.S. Census Bureau calculates new poverty statistics.⁵ Although analysis by the U.S. Census Bureau found FRPL data were an imprecise estimate for school-age poverty for a variety of reasons (Powers & Cruse, 2006), both FRPL and poverty rate are direct measures of economic disadvantage.

Poverty rate measures school age students within households at or below the federal poverty level for a given family size in a particular region.⁶ This is a different measure than FRPL. Students at or below 130% of the poverty level are eligible for free lunch and breakfast, and students at or below 185% of the poverty level are eligible for reduced price lunch and breakfast. As a result, Census poverty rates are much lower than FRPL rates for the same district and a scaling factor would be required to keep consistency with the current range of FRPL data.

⁵ Small Area Income and Poverty Estimates (SAIPE) data comes from three sources. The Census Bureau uses a mix of single-year American Community Survey (ACS) data, Supplemental Nutrition Assistance Program (SNAP) data, and IRS tax returns to generate state and county level poverty data. The IRS individual returns measure the number of dependents in households with sub-poverty level income, and the addresses on the tax returns are placed in school districts. ACS population estimates are used to eliminate non-school-aged dependents on tax returns. This provides an estimate of the poverty rate. This rate is multiplied by the estimated school aged population from the ACS and proportionally adjusted to match county level SAIPE data. Methodology details are available here: <http://www.census.gov/did/www/saipe/methods/index.html>

⁶ The federal poverty level is determined by a “set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family’s total income is less than the family’s threshold, then that family and every individual in it is considered in poverty.” Methodology details are available here: <https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html>

Burden	Credibility	Distribution
No additional burden on parents, NYSED, or school administrators. Data is collected and available.	As direct data from tax forms, Census poverty data includes all filing residents, not just public students, which could create bias in districts with large and economically indistinguishable nonpublic populations or large non-filing populations.	As a replacement to FRPL data, without an additive or scaling factor, poverty counts and percentages are dramatically lower than FRPL counts and percentages. However, as a replacement for existing Census poverty rates, there is a minimal shift.

Few states use Federal Small Area Income and Poverty Estimates to determine state funding levels.

G. WEIGHTED DIRECT CERTIFICATION DATA

The USDA and DOE have suggested replacing FRPL data with the product of 1.6 * the proportion of directly certified students (United States Department of Agriculture, Food and Nutrition Service, 2016). Directly certified students are automatically eligible for free school meals based on eligibility for other means tested programs. Direct certification data is currently used to identify schools, groups of schools, or districts that are eligible to provide universal free lunch and breakfast under the CEP.

The NYSED Child Nutrition Office has begun collecting SNAP and Medicaid participation data by school once each year. This data is referred to as “direct certified” as these students are automatically eligible for school meal programs. For at least the 2015-16 and 2016-17 school years, direct certification data is gathered, checked, and reported through districts. In the future, automatic matching done at the state level may be available, which would reduce burdens on districts and potentially reduce difficulties in matching student level data.

Data from Medicaid and SNAP is subject to rigorous accountability controls, more so than FRPL data. The data is only collected for districts participating in the federal meal programs; approximately 25 districts in New York State do not participate in these programs. Additionally, in the first year of collection, 21 districts contained at least one school for which the district did not report data.

Like FRPL, direct certification data counts eligible applicants, not eligibility of the total population. In some cases, participation rates may vary for reasons other than eligibility. For example, SNAP participation rates for eligible individuals tend to be lower in urban areas, which may skew results (Elsami, Filion, & Strayer, 2011).

Burden	Credibility	Distribution
Data are currently reported to NYSED by all districts participating in the federal school lunch program.	Adopted in many states, consistent with USDA and DOE recommendations. Granular at a school level, directly matches state or federal agency records. Undercounts eligible families who do not apply for programs. The 1.6 multiplier is a more accurate approximation for student need in some districts than others, but is limited in its ability to distinguish differences in the districts with large concentrations of poverty.	Switching to direct certification data will cause a dramatic drop from current FRPL rates without a multiplier. Using a 1.6 multiplier limits the distinctions between the districts with the highest rates.

Oklahoma and Virginia have chosen to use direct certification data with the 1.6 multiplier (Putnam, 2015), (Virginia Department of Education, 2014). Massachusetts has chosen to use direct certification pupils, utilizing a count and percentage of SNAP, Medicaid, TANF, and foster care program applicants as a replacement for FRPL data, without the 1.6 multiplier (Massachusetts Department of Elementary and Secondary Education, 2015). Massachusetts has taken the position that these numbers are distinct from prior year FRPL data, and the two should not be compared.

H. INCOME FORMS FOR ALL STUDENTS

This option would discontinue the use of FRPL form data and require all students to fill out an income form not connected with to the school meals program instead. FRPL form data would still be required of parents and schools for participation in the Federal National School Lunch Program (NSLP) and the School Breakfast Program (SBP). Since this income form would not be required for FRPL eligibility, this change may exacerbate concerns with underreporting. However, the data would be consistent across schools and districts, having all come from a single source.

Burden	Credibility	Distribution
Requiring income verification forms for all students would be an additional burden to parents, administrators, and NYSED, beyond current requirements. Costs cannot be covered by school food service accounts.	Consistent measure across schools, but will likely result in underreporting as parents have no incentive to comply.	Unclear at this time, as data are not available.

California has decided to continue collecting income forms for all students to provide income based poverty information to districts, but has reduced collection to once every four years (California Department of Education, 2015). Quadrennial collection reduces burdens on parents and administrators, but at the cost of lagged data and greater variation when updated.

I. NON-FINANCIAL ALTERNATIVE MEASURES

All of the above referenced options reflect financial need within a student's family. The National Forum on Education Statistics recently released a report on alternate measures to socioeconomic status (SES) in education data systems (National Forum on Education Statistics,

2015). The report provides information on alternatives to FRPL data as a proxy for student and family socioeconomic status. The report criticizes the use of FRPL data as a proxy for SES as it only reflects the family income component of SES, ignoring other non-financial needs a student may face.

The report suggests several options to replace FRPL values, each of which has been discussed in sufficient detail above. The report advocates for coupling measures of income with other measures of SES to form a more complete picture. These measures include level of educational attainment for parents, parental occupation, and community level data such as neighborhood SES or district level poverty. Other analyses have used similar measures, including percentage of parents with a college degree, percentage of single parents, poverty rate, SNAP utilization, and unemployment rate (Reardon, Kalogrides, & Shores, 2016, p. 20).

Several robust and valid classification and quantification methods are available for occupation or educational attainment data, such as the ISEI (Ganzeboom, De Graaf, Treiman, & De Leeuw, 1992) or CAMSIS scale (Prandy & Jones, 2001). However, parental occupation, educational attainment, neighborhood level data are not currently available on a district level. Collecting the data from parents would impose an additional burden, vulnerable to an underreporting bias, and would be difficult to verify.

These concerns are not new. The 1989-90 Regents State Aid Proposal also included similar data points to generate an Educational Risk Index. The Board of Regents proposed creating and using this index in Public Accountability for Comprehensive Education (PACE) Aid. This index was constructed from 12 data points within three categories of need:

1. Economic need: unemployment rate, long-term unemployed, poverty rate, and FRPL;
2. Social need: the rate of children in single parent families, households receiving public assistance, housing units with more than one person per room, housing units with incomplete plumbing, and the percent of population 5-17 years old living in poverty; and
3. Educational need: the rate of adults who did not graduate high school, adults not speaking English at home, and the district dropout rate.

Ten of the 12 measures came from the most recent U.S. Census, and the data are no longer available at a school district level. Some of these measures are available at a county, metropolitan statistical area (MSA), or labor force region level. However, using county, MSA, or regional data is undesirable as it would push districts towards the county, MSA, or regional mean—underestimating needs among the neediest, and overestimating among the least needy. This proposal was never adopted into law.

CONCLUSION

While FRPL is still a reasonable measure of student need, legitimate concerns about the current status quo undercounting FRPL eligible students in CEP schools and districts cast doubt on the accuracy of these measures in CEP schools. Even though New York State has only approximately 50 districts with at least one CEP school, these districts include New York City, three of the Big 4 city districts, and several other large districts. In addition, for the 2016-17 school year to date, NYSED's Child Nutrition Office has received an additional 25 applications from public districts and BOCES to participate in CEP, indicating that the interest in CEP continues to grow. This growth includes both new districts and those that are expanding into more schools. In total, more than half of all students in New York State attend a district with at least one CEP school. The options outlined in this report provide a roadmap for the Legislature and Governor to consider the best alternative use of data to address these issues.

To recap, those options include:

- Using weighted direct certification data from other anti-poverty programs;
- Using new or derived data from the Department of Taxation and Finance;
- Using updated Federal Census poverty data;
- Requiring all students to provide income inquiry forms;
- Freezing and/or holding harmless data currently in use; and
- Other non-financial alternative measures.

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APPENDIX A: DISTRICT CEP IMPLEMENTATION

District	Implementation	Participating Schools	Schools in District	2015-16 Total District Public Enrollment
Albany City SD	District-Wide	18	18	11,025
Amsterdam City SD	District-Wide	6	7	3,715
Auburn City SD	Group of Schools	5	9	4,295
Beekmantown CSD	District-Wide	4	4	1,815
Binghamton City SD	District-Wide	13	13	5,611
Buffalo City SD	District-Wide	70	73	40,112
Central Valley CSD At Ilion-Mohawk	District-Wide	5	5	2,253
Cheektowaga CSD	Group of Schools	3	4	2,141
Clyde-Savannah CSD	Group of Schools	1	2	815
Cohoes City SD	Group of Schools	3	6	1,911
Dunkirk City SD	District-Wide	6	7	2,020
Elmira City SD	District-Wide	13	13	6,201
Fallsburg CSD	District-Wide	2	2	1,405
Fort Plain CSD	Group of Schools	1	2	750
Franklinville CSD	District-Wide	2	2	679
Genesee Valley CSD	District-Wide	2	2	531
Geneva City SD	Group of Schools	3	5	2,214
Gloversville SD	District-Wide	7	7	2,737
Hempstead UFSD	District-Wide	10	10	8,764
Hudson City SD	District-Wide	3	3	1,778
Jamestown City SD	District-Wide	9	9	4,735
Kingston City SD	Group of Schools	2	10	6,260
Lansingburgh CSD	District-Wide	4	4	2,377
Liberty CSD	District-Wide	2	4	1,545
Lyons CSD	District-Wide	2	2	891
Monticello CSD	Group of Schools	3	5	3,001
Mt Vernon School District	Group of Schools	4	16	8,721

District	Implementation	Participating Schools	Schools in District	2015-16 Total District Public Enrollment
Newark CSD	Group of Schools	3	5	2,108
Newburgh City SD	Group of Schools	10	16	11,074
Niagara Falls City SD	District-Wide	11	11	7,095
Northern Adirondack CSD	District-Wide	2	2	812
Oppenheim-Ephratah-St. Johnsville	Group of Schools	1	2	723
Owego-Apalachin CSD	Group of Schools	1	5	2,071
Plattsburgh City SD	District-Wide	6	6	1,812
Port Byron CSD	Group of Schools	1	2	954
Poughkeepsie City SD	District-Wide	7	9	4,378
Rensselaer City SD	District-Wide	1	1	1,084
Riverhead CSD	Group of Schools	3	7	5,622
Rochester City SD	District-Wide	55	55	32,650
Roosevelt UFSD	District-Wide	5	5	3,509
Salamanca City SD	District-Wide	3	3	1,225
Schenectady City SD	District-Wide	19	20	9,722
Schroon Lake Central School	District-Wide	1	1	191
Scio CSD	District-Wide	1	1	331
South Lewis CSD	Group of Schools	2	3	1,079
South Seneca CSD	Group of Schools	1	2	733
Syracuse City SD	District-Wide	34	38	21,691
Ticonderoga CSD	District-Wide	2	2	794
Troy City SD	District-Wide	8	8	4,658
Utica City SD	District-Wide	14	14	10,310
Westbury UFSD	District-Wide	6	6	5,225
Wyandanch UFSD	District-Wide	4	4	2,470

APPENDIX B: FEEDBACK FROM THE FIELD

In preparation for this report and consistent with the requirements of Chapter 54, NYSED held round table discussion meetings with school districts and advocates. Each school district with at least one CEP school was invited to participate in the discussion June 21, 2016. Attendees included representatives from the Auburn, Newburg, Troy, Hudson, Schenectady, and Westbury school districts. Each advocacy group representing one or more of these schools was invited to participate in a separate round table discussion June 22, 2016. A follow-up discussion with representatives of the Big 5 city school districts occurred on August 8, 2016. Attending groups included representatives from the Council on Big 5 Schools, NYSUT, NYSCOSS, and NYSSBA. NYSED staff from IRS, Child Nutrition, FARU, and State Aid attended each meeting. All participants were invited to share concerns, suggestions, and opinions on the matter.

On June 21, attending districts expressed concerns with the current methodology and the impact on aid from undercounting FRPL eligible students in CEP schools. District representatives also expressed concerns with the administrative burden of collecting income forms, as well as the administrative burden of matching direct certification data. Several district representatives suggested considering income data from the Department of Taxation and Finance, but other representatives cautioned this measure is not specific to public school students and would not include non-filing families. Other representatives suggested the SAIPE poverty rate, but other representatives argued this data is not valid for their district. One district representative suggested measuring not just the incidence of need of individual students, but also the depth and duration, making the case that variations in the latter can be more significant than the rate of incidence. Other suggestions included measuring food insecurity more broadly, inquiring into federal databases on vulnerable populations, or other socio-economic measures. Discussion concluded by noting FRPL is a proxy for student need to approximate the cost to educate a needy student, and that an alternative measure would not need to be specific to a meal program.

The advocates on June 22 were also concerned with falling FRPL rates in CEP districts and relayed concerns from the field about FRPL not fully capturing need. Not all advocates had heard of the problem, but those who had, heard it from the big city districts. Advocates expressed concern with the complexity of income and FRPL forms, and did not want to replace one form with another. Advocates were concerned with aid formulas disadvantaging the neediest districts and did not want to continue with the status quo until a new system was in place. Two advocates suggested a hold harmless for FRPL percent in districts with at least one school participating in CEP, dating back to the time when CEP was first implemented. One advocate explained that FRPL was a good measure because it was specific to public school enrollees. Another advocate mentioned Department of Taxation and Finance data, but expressed concern with the lack of identification between public, private, and home schooled students.

Representatives from the Big Five City school districts on August 8 were concerned with sliding FRPL rates and the increasing difficulty of getting parents to fill out income forms in CEP schools. District representatives were asked for opinions on the FRPL and a replacement generally, but also specifically about the direct certification rate. District representatives generally were not certain how direct certification data compared to FRPL. One district representative suggested looking at Federal Title I allocations for ideas on measuring need. Another attendee requested NYSED look at replacing all of the poverty indicators, noting some indicators were quite dated, and asked whether the new data would be phased in or the change would be abrupt. Attendees discussed the merits of a freeze or floor for current FRPL data, and promised to send any additional comments regarding direct certification in the future. NYSED would like to thank the districts and advocates that took time to participate in these discussions. The feedback they provided was

valuable, and this report incorporates many of the suggestions and considerations brought to NYSED by these individuals and groups.

APPENDIX C: SAMPLE FEDERAL STUDENT MEAL APPLICATION FORM

2015-2016 Prototype Application for Free and Reduced Price School Meals

Apply online at www.abcdefgh.edu

Complete one application per household. Please use a pen (not a pencil).

STEP 1 List ALL Household Members who are infants, children, and students up to and including grade 12 (if more spaces are required for additional names, attach another sheet of paper)

Definition of Household Member: "Anyone who is living with you and shares income and expenses, even if not related." Children in Foster care and children who meet the definition of Homeless, Migrant or Runaway are eligible for free meals. Read How to Apply for Free and Reduced Price School Meals for more information.	Child's First Name	MI	Child's Last Name	Student?	Homeless, Foster Child, Migrant, Runaway		
	Yes	No	Yes	No	Yes	No	
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

STEP 2 Do any Household Members (including you) currently participate in one or more of the following assistance programs: SNAP, TANF, or FDIPIR? Circle one: Yes / No

If you answered NO > Complete STEP 3. If you answered YES > Write a case number here then go to STEP 4 (Do not complete STEP 3)

Case Number:

Write only one case number in this space.

STEP 3 Report Income for ALL Household Members (Skip this step if you answered "Yes" to STEP 2)

Please read How to Apply for Free and Reduced Price School Meals for more information. The Sources of Income for Children section will help you with the Child Income question. The Sources of Income for Adults section will help you with the All Adult Household Members section.

A. Child Income
Sometimes children in the household earn income. Please include the TOTAL income earned by all Household Members listed in STEP 1 here.

Child Income How often?
 \$ Weekly Bi-Weekly 2x Month Monthly

B. All Adult Household Members (including yourself)
List all Household Members not listed in STEP 1 (including yourself) even if they do not receive income. For each Household Member listed, if they do receive income, report total income for each source in whole dollars only. If they do not receive income from any source, write "0". If you enter "0" or leave any fields blank, you are certifying (promising) that there is no income to report.

Name of Adult Household Members (First and Last)	Earnings from Work	How often?				Public Assistance/ Child Support/Alimony	How often?				Pensions/Retirement/ All Other Income	How often?			
		Weekly	Bi-Weekly	2x Month	Monthly		Weekly	Bi-Weekly	2x Month	Monthly		Weekly	Bi-Weekly	2x Month	Monthly
<input style="width: 100%;" type="text"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input style="width: 100%;" type="text"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input style="width: 100%;" type="text"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input style="width: 100%;" type="text"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input style="width: 40px;" type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Total Household Members (Children and Adults)

Last Four Digits of Social Security Number (SSN) of Primary Wage Earner or Other Adult Household Member X X X X Check if no SSN

STEP 4 Contact information and adult signature

I certify (promise) that all information on this application is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws.

<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Street Address (if available)	Apt #	City	State	Zip
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Printed name of adult completing the form	Signature of adult completing the form		Today's date	

OPTIONAL Children's Racial and Ethnic Identities

We are required to ask for information about your children's race and ethnicity. This information is important and helps to make sure we are fully serving our community. Responding to this section is optional and does not affect your children's eligibility for free or reduced price meals.

Ethnicity (check one):

- Hispanic or Latino
- Not Hispanic or Latino

Race (check one or more):

- American Indian or Alaskan Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White

The **Richard B. Russell National School Lunch Act** requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the last four digits of the social security number of the adult household member who signs the application. The last four digits of the social security number is not required when you apply on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

The U.S Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of

an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer.

Source: (USDA Food and Nutrition Service, 2016)

APPENDIX D: SAMPLE CEP INCOME ELIGIBILITY FORM

F____R____D____

2015-16 Community Eligibility Provision (CEP)/Provision 2 non-base year Household Income Eligibility Form

SAMPLE School District is participating in the Community Eligibility Provision (CEP) or Provision 2 in a non-base year. All children in the school will receive meals/milk at no charge regardless of household income or completion of this form. This form is to determine eligibility for additional State and federal program benefits that your child(ren) may qualify for. Read the instructions on the back, complete **only one** form for your household, sign your name and return it to the school named above. Call XXX-XXX-XXXX, if you need help.

1. List all children in your household who attend school:

Student Name	School	Grade/Teacher	Foster Child	No Income
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>

2. SNAP/TANF/FDPIR Benefits:

If anyone in your household receives either SNAP, TANF or FDPIR benefits, list their name and CASE # here. Skip to Part 5, and sign the application.

Name: _____ CASE # _____

3. Household Gross Income: List all people living in your household, how much and how often they are paid (weekly, every other week, twice per month, monthly). Do not leave income blank. If no income, check box. If you have listed a foster child above, you must report their personal income.

Name of household member	Earnings from work before deductions Amount / How Often	Child Support, Alimony Amount / How Often	Pensions, Retirement Payments Amount / How Often	Other Income, Social Security Amount / How Often	No Income
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>
	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	\$ _____ / _____	<input type="checkbox"/>

4. Signature: An adult household member must sign this application.

I certify (promise) that all of the information on this application is true and that all income is reported. I understand that the information is being given so the school may receive federal funds. The school officials may verify the information and if I purposely give false information, I may be prosecuted under applicable State and federal laws, and my children may lose meal benefits.

Signature: _____ Date: _____

Email Address: _____
Home Phone _____ Work Phone _____ Home Address _____

DO NOT WRITE BELOW THIS LINE – FOR SCHOOL USE ONLY	
Annual Income Conversion (Only convert when multiple income frequencies are reported on application) Weekly X 52; Every Two Weeks (bi-weekly) X 26; Twice Per Month X 24; Monthly X 12	
<input type="checkbox"/> SNAP/TANF/Foster	
<input type="checkbox"/> Income Household: Total Household Income/How Often: _____ / _____	Household Size: _____
<input type="checkbox"/> Free Eligibility <input type="checkbox"/> Reduced Eligibility <input type="checkbox"/> Denied Eligibility	
<input type="checkbox"/> Signature of Reviewing Official _____	Date Notice Sent: _____