



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**

REPORT TO THE LEGISLATURE

# Statewide Repository of Household Income Information

*2022*

**Authorizing Legislation: [RCW 28A.235.285](#)**

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# EXECUTIVE SUMMARY

To reduce barriers to accessing free and reduced-price meal benefits, the 2022 Legislature directed the Office of Superintendent of Public Instruction (OSPI) to initiate and oversee the development and implementation of a statewide electronic repository of household income information. This information is required for a student's enrollment in, or eligibility for, the National School Lunch Program (NSLP), the School Breakfast Program (SBP), or both programs.

The system must comply with federal child nutrition requirements; connect with the state's Direct Certification system; and include robust safeguards. This is an initial report about the system that includes a plan, timeline, and cost estimate for:

1. Implementing the development of the system,
2. Securing any needed vendors, and
3. Making the system accessible for users.

# INTRODUCTION

Currently, 302 public school districts in Washington (including charter and state-tribal education compact schools) participate in the U.S. Department of Agriculture (USDA) National School Lunch Program. Code of Federal Regulations (CFR) 7 CFR 210 requires participating school districts to distribute free and reduced-price meal applications to households. Meal applications are used to determine student eligibility for free or reduced-price meal benefits based on USDA Income Eligibility Guidelines. Washington state participating schools have several options for this process:

- USDA Prototype Paper Meal Application
- Washington state Prototype Paper Meal Application
- Vendor Scanned Meal Application
- Vendor Web-based Online Meal Application

USDA regulations govern the content and processing of meal applications in the [Eligibility Manual for School Meals](#).

The meal application is not the only method of determining eligibility for school meal benefits. USDA also requires automatic eligibility for free meals due to a child's—or any household member's—receipt of benefits under an Assistance Program, or a child's designation as "other source categorically eligible." This determination is distinguished as "directly certified."

Other USDA programs like the Community Eligibility Provision (CEP) prohibit distribution of meal applications and use other means to establish the student population otherwise eligible for free or reduced-price meal benefits. CEP schools are reimbursed using a formula based on the percentage of students who are directly certified. In the 2022–23 school year, there are 1,210 schools participating in CEP.

# CURRENT LANDSCAPE OF COLLECTION OF INCOME INFORMATION

## Direct Certification

Students may be directly certified for free or reduced-price meals based on participation in Basic Food, Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), certain Medicaid Programs, Head Start/Even Start, Early Childhood Education and Assistance Program (ECEAP), along with being in foster care, experiencing homelessness, and receiving Migrant Education Program services. OSPI maintains an electronic direct certification system, which utilizes data obtained through a data share agreement with the Washington State Department of Social and Health Services (DSHS).

Washington requires schools to identify directly certified eligible students on a monthly basis ([Revised Code of Washington \(RCW\) 28A.235.280](#)). Approximately 66% of students qualifying for meal benefits are directly certified.

## Meal Application

To inform families about the availability of free and reduced-price meals, schools must distribute information letters to the households of children attending the school [7 CFR 245.5(a)(1)]. This letter typically includes a paper copy of the meal application and/or directs families to an online Meal Application. USDA regulations dictate what information is collected in a meal application.

Local education agencies (LEAs) have the choice to use the USDA prototype meal application or the Washington state prototype meal application. USDA allows use of an electronic meal application, but an option to complete a paper application must also be available. In Washington, approximately 235 LEAs currently make an online meal application available to households.

## Family Income Survey

Outside of school meal programs, several funding models and program qualifications rely on student household income information. Washington utilizes a Family Income Survey, which is an alternative data collection method when Meal Applications are not allowable.

Situations where Family Income Surveys are utilized include:

- Schools that do not participate in the National School Lunch Program. This includes schools that have elected to not participate for various reasons or schools that do not qualify to participate (i.e., online schools, some skill centers). Approximately 8 schools do not participate in the NSLP.
- Schools that operate the Community Eligibility Provision.

## **Local Level Systems in Use**

Initial research identified 235 LEAs with existing web-based platforms or electronic systems to determine eligibility. The most commonly used local system that includes an online meal application is Skyward. Eighty LEAs use Skyward, which is offered through the Washington School Information Processing Cooperative (WSIPC). Meal applications are typically part of a suite of products versus a stand-alone option. Also of note is that local level systems are not integrated with the Direct Certification System. Therefore, families sometimes apply, even when they are directly certified and an application is not needed.

# OPTIONS FOR STATEWIDE REPOSITORY

Three models were explored as options to meet the intent of the legislation: Basic, Middle, and Comprehensive.

## Basic

A Basic model would leverage and utilize existing local systems while improving access. For this model, a website would be created that helps families quickly and easily find online applications. The website would feature a landing page, where families can connect to their district/school's online application. For districts that do not have an online application, it would direct families to where a paper application can be accessed or to their LEA's child nutrition office. The landing page would also feature links to other food security resources.

This basic model could be implemented with existing resources and be ready for the 2023–24 school year.

## Middle

A Middle model would provide statewide use of an electronic online application system, hosted by OSPI, that would feature both a Meal Application and the Family Income Survey. The system would be connected to the existing OSPI Direct Certification system and be able to identify if a student is directly certified. If identified, this system would notify the household that they are already qualified and an application does not need to be completed.

Market research indicates that a commercial off the shelf product with customization to integrate with existing OSPI systems could be used. The cost of a statewide system is indeterminate; existing online meal applications are offered as part of a suite of products, and pricing varies depending on the suite of products and pricing models. Additionally, systems vary in their price structure, with some being based on the number of applications submitted and others based on the full-time equivalent number of school employees.

Customizations would include connection to existing OSPI systems including Direct Certification and existing OSPI data, such as CEP schools. Functionality would also need to be addressed regarding moving applications through the system for local processing and verification of meal applications. At the earliest, a pilot for the middle system with a group of districts could be implemented in the 2024–25 school year, with statewide implementation coming no earlier than the 2025–26 school year.

## Comprehensive Model

A Comprehensive model would be custom-built, providing connections to existing systems and improving household access. Similar to the Middle model, this system would feature both a Meal Application and Family Income Survey. The system would be connected to the existing OSPI Direct Certification system and be able to identify if a student is directly certified. If identified, this system

would notify the household that they are already qualified, and an application does not need to be completed.

The system could also connect to other benefit systems in the state, like *Washington Connections*, and use income information already provided by households. Additionally, the system would be dynamic and provide ongoing access for households to update addresses and other household information.

The cost and implementation timeline for a comprehensive system is indeterminate. OSPI recommends a feasibility study to fully evaluate system requirements.



## **CONCLUSION & NEXT STEPS**

Ongoing work needs to be done around the collection of student income data. Immediate steps can be taken to improve household access to school meal applications. OSPI will implement an easily identifiable web address that will direct families to their district online meal application or to information about where a meal application can be completed.

A Middle or Comprehensive model may also be considered at the further direction and support of the Legislature.

## **ACKNOWLEDGEMENTS**

Information collected by Solutions Resource, LLC, was utilized for this report.

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