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REPORT TO THE LEGISLATURE

Examination of the Use of Free and Reduced-Price Lunch Metric

2025

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As specified in ESSB 5950, Sec. 501(4)(ss), the OSPI may contract with a third party to conduct all or any portion of the work. OSPI partnered with Kauffman and Associates, Inc., (KAI) to complete this work. KAI provided a report outlining the process for evaluating the existing low-income metric and identifies and recommends alternative metrics.

KAUFFMAN

AND ASSOCIATES INCORPORATED

Examination of the use of Free and Reduced-Priced Lunch Metric as a Program and Funding Driver

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Submitted to: Jen Appleyard, Director of Data Governance, OSPI
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Executive Summary

On March 29, 2024, WASB5950 was enacted. Proviso 501(ss) states:

> $150,000 of the general fund-state appropriation for the fiscal year 2025 is provided solely for the office of the superintendent of public instruction to examine how free and reduced-price school meal data is used as a funding driver for programs such as the learning assistance program and provide recommendations for alternative metric or metrics to the legislature by January 1, 2025. The office may collaborate with other state agencies that maintain income and poverty data to develop alternative metrics, including but not limited to the department of social and health services, the student achievement council, and the health care authority. In creating recommendations, the office shall work with educational stakeholders including organizations representing principals, school board directors, certified teachers, and classified staff. The office may contract with a third party to conduct all or any portion of the work.

This report outlines the process and outcomes for evaluating the existing low-income metric used as a funding and program driver, and identifies and recommends alternative metrics. Our findings suggest that the method of identifying whether a student, school or district are "low income" should all be different, depending upon how the programming and funding is targeted. The current model of using categorical eligibility[1] plus a family income/meal application to identify students eligible for free and reduced-priced lunch seems promising for identifying low-income students. Although data is not yet available, as the change is in the first year, the state's new Child Nutrition Eligibility and Education Benefit (CNEEB) application appears feasible.

This report poses alternative options to determine which schools and districts qualify for low-income programs. These approaches remove the reliance on families filling out forms and would help the state target underprivileged neighborhoods, not individuals. In particular, Washington State could follow suit with other states (such as Colorado) and consider developing a neighborhood socioeconomic status[2] (nSES) measure to identify the economic status of schools. Its feasibility and accuracy depend on how it's developed and implemented, but early thinking suggests it could help identify school poverty levels more accurately. For programs and funding directed toward districts, the U.S. Census Bureau's annual Small Area Income Poverty Estimates is suggested as it was designed for this purpose. Moreover, it is already used in the state of Washington for some district-level programming and for funding allocation such as Title 1.[3]

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[1] Categorical eligibility uses information provided by state or local agencies to identify students in specific student groups (for example, migrant students) and those who are recipients of certain programs (for example, the Supplemental Nutrition Assistance Program).

[2] SES is broadly defined as one's access to financial, social, cultural, and human capital resources. A student's SES can include parental educational attainment and occupational status, household income, and neighborhood.

[3] A federal program that funds additional academic support and learning opportunities to help low-achieving children master challenging curricula and meet the state standards in core academic subjects.

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Background

The Washington State Office of the Superintendent of Public Instruction (OSPI) partnered with Kauffman and Associates, Inc., (KAI) to examine and report on:

- How free and reduced-price lunch (FRL) data is used as funding drivers for programs within and outside OSPI,
- Explore alternatives to the current FRL metric, and
- Provide recommendations for alternatives if any are feasible.

This work addresses Engrossed Substitute Senate Bill 5950, Section 501(3) (ss) of the laws of 2024.[i]

The United States Department of Agriculture (USDA) National School Lunch Program requires eligibility determinations (free, reduced price or paid) to be made for students participating in the program. These determinations drive the reimbursement rate of each meal served to the corresponding student.

Student eligibility and classification—frequently referred to as free and reduced-price school meal data—is recorded in district data systems and reported to OSPI through the Comprehensive Education Data and Research System.

Student eligibility can be determined by categorical eligibility or through a meal application. Categorical eligibility is based on a student's participation or on a student's household's participation in a means-tested program such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF), and some categories of Medicaid. Students in foster care, experiencing homelessness, or being served by migrant education are also categorically eligible. Eligibility through approval of a meal application is based on the USDA Income Eligibility Guidelines.

Implemented in 2012, the USDA Community Eligibility Provision (CEP) allows schools with a large population of categorically eligible students to serve meals to all students free of charge and without the requirement of collecting meal applications.[ii] In 2022 CEP requirements were updated, allowing for more schools to be eligible. That same year, a law was passed in Washington state requiring schools that qualify for CEP to participate in the program. In 2016, just over 5,200 students in Washington participated in CEP. By 2024, it has grown to almost 575,700.[iii]

Schools that adopt CEP are reimbursed using a formula based on the percentage of students categorically eligible for free meals, which is determined by their participation in other specific means-tested programs, such as the Supplemental Nutrition Assistance Program and Temporary Assistance for Needy Families. USDA rules did not allow schools participating in CEP to collect meal applications. In place of a meal application, CEP schools encouraged households to submit a Family Income Survey (FIS). The FIS collects similar information and uses the USDA income guidelines. However, without the incentive of needing to complete an application to receive meals free of charge, there was potentially a decrease in identifying the number of households qualifying as low income.

Additional state legislation passed in 2023 requiring elementary schools that were not eligible for CEP, but, had a high number of students eligible for free or reduced-priced meals to also offer meals at no charge. While schools operating this program are still required to collect meal applications, without an incentive there is often a decline in households completing an application.

The Consolidated Appropriations Act, 2023 (P.L. 117-328) authorized a permanent, nationwide Summer Electronic Benefit Transfer (Summer EBT) program to support children who lose access to free and reduced-price school meals during the summer months. With this new program, USDA updated CEP rules, allowing an application that collects income information and qualifies students for Summer EBT to be administered in CEP schools. Washington implemented the use of the CNEEB application in school year 2024-25.

School meal eligibility has historically been used as a proxy to determine low income, for reporting purposes, and to ascertain eligibility for funds to pay for student participation in other programs such as sports. With changes in meal programs at both the federal and state level, there has been a decline in the number of household applications for FRL which reduces the number of students identified as FRL[iv]. In addition, due to a pause in required reporting of FRL during the pandemic, schools have faced different challenges in collecting and reporting these data.[iii] Finally, schools that do not have a meal program (online schools and some private and charter schools) have little incentive to collect and report income applications.[iii]

Other states have experienced similar struggles with FRL data and have moved, or are considering moving, to other methods for determining which students qualify as low income. A decrease in efforts to identify students who qualify as low income impacts reporting and tracking of these students and influences how funding gets allocated to students, schools, and educators. As such, insights outside of Washington state are valuable to identify alternatives to the FRL metric and their reliability and feasibility.

Identifying which students, schools and districts are low income is important as economic deprivation can negatively impact academic outcomes. Students from families with low SES may experience obstacles to academic success related to a lack of financial security and limited access to social and health resources leading to poor quality of life.[v] These barriers may negatively affect a student's educational opportunities[vi] and school readiness, impacting academic performance[vii] as students from low-income families generally graduate high school at a lower rate.[viii] Increased funding for education may help mitigate the statistical relationship between graduation rates in low-income communities, and high-income communities.[ix] Federal law requires states track academic outcomes to identify which schools need additional supports.[x]

Methods

Recruitment

In partnership with the OSPI team, KAI developed a list of professionals and academics to participate in a virtual focus group or one-on-one interview. KAI emailed invitations describing the purpose of the interviews and what participation entailed.

Qualitative Data Collection

The data collection included virtual focus groups with a moderator and notetaker, and one-on-one interviews with a moderator. The focus groups and interviews opened with a description of the voluntary nature of being a participant and the risks and benefits to participation. After consent, all discussions were recorded. The recorded discussions were transcribed and reviewed for errors prior to data analysis.

Qualitative Data Analysis

Two researchers from the KAI team analyzed the focus group and interview data on two levels: 1) a basic descriptive level and 2) a higher latent level. Basic descriptive levels of qualitative narrative analysis focus on what was said, whereas higher latent levels analyze not only what was said but also what was inferred or implied, thereby capturing attitude, mood, and other nuances of the captured content. Coding trees and matrices coupled with frequency analysis were used to identify common themes; mitigating factors; and latent traits from interviews, focus groups, and case studies. Qualitative themes are organized in accordance with the priorities established with OSPI and used to guide the summary of findings.

Results

Participants

KAI conducted two focus groups—one with OSPI staff (n=13) and one with Washington State agency staff (n=15). The Washington State agency staff focus group included participants from the following departments and organizations:

- Office of Financial Management
- Department of Health
- Labor & Industries
- Health Care Authority
- Washington State Association of Counties
- Department of Health and Human Services
- Washington State School Directors' Association

Representatives from the Washington Interscholastic Activities Association were invited to participate in the focus group, but declined, citing that they no longer use the FRL metric.

However, they did provide insights into the reasons for their change in policy through email during the analysis phase.

KAI also conducted seven interviews with eight out-of-state experts. The out-of-state experts represented five states (Oregon, Rhode Island, Massachusetts, Colorado (n=2), and Michigan) and two national organizations (The Urban Institute and the Council of Chief State School Officers). These specific states were selected by the OSPI team because they had explored and implemented alternative approaches. Other states (New Mexico, Vermont, and Missouri) were contacted, but the research team was unable to engage an expert in those states willing to participate.

How the FRL Metric is Currently Determined

Students have traditionally been identified as "low-income" based on their eligibility for FRL through the USDA National School Lunch and School Breakfast Program. Low-income eligibility is based on a student being categorically eligible or qualifying by a meal application. Categorical eligibility (often referred to as being directly certified) includes students in households approved for TANF, SNAP, certain Medicaid Programs, Food Distribution Program on Indian Reservations (FDPIR), enrolled in the Early Childhood Education and Assistance Program or Head Start, are runaway, houseless, or receiving migrant education services.[xi] Eligibility by meal application is based on household size and federal income limits.

USDA rules did not allow schools participating in CEP to collect meal applications. In place of a meal application, CEP schools encouraged households to submit a FIS. The FIS collects similar information and uses USDA income guidelines. However, without the incentive of needing to complete an application to receive meals free of charge, there has been a decrease in identifying the number of households qualifying as low income. As more schools participate in the CEP, due to state legislation and changes in the criteria for CEP, fewer and fewer meal applications were being completed.

Between 2018 and 2024, the number of students who qualified as low income through categorical eligibility increased from 375,333 to 499,894, far higher than the numbers of all other students qualifying through any other method. In contrast, the number of students qualifying as low income through household applications decreased substantially, from 239,512 in 2018 to 66,207 in 2024.

Recent Changes to the FRL Family Income Form

In 2023, to support the administration of the Summer EBT[4] program, the USDA changed its policy and now allows CEP schools to collect applications. The Summer EBT program provides money to families to support children who lose access to FRL during the summer months.[xii] In response, in the summer of 2023, OSPI consolidated the school meal application and FIS to ease school administrative burden and decrease households' confusion with multiple forms.

[4] A federal nutrition program that provides grocery benefits during the summer months to families with children eligible for free or reduced-price school meals.

This new form is the CNEEB[xiii] application. Since families who complete it may be eligible for direct nutritional funding over the summer, there is an incentive for them to complete it.

According to OSPI staff, this current approach looks promising, and they believe that it will improve the identification of students qualifying as low income and improve the use of the FRL metric as a proxy for low income. However, data is not available yet to determine its impact.

Low-income Proxy Measures Needs in Washington State

The focus group participants from both OSPI and other Washington State agencies described the qualities of a good low-income proxy measure. They emphasized the importance of having a readily available measure, which is why the FRL metric is used extensively throughout the state. And, although the FRL metric's appropriateness as a proxy for low income has come into question, participants stated that it is convenient and has an established history of use. Often the accuracy of a measure varies depending upon what level it is used (at the individual, school or LEA[5] level)—an essential element to keep in mind, as alternative metrics are discussed and considered.

Use of the FRL Metric in Washington State

OSPI staff and professionals from other Washington State agencies shared how they use the metric to inform programming, reporting and, in some cases, funding. They described how they use the FRL metric in their work, what impact it has, and if there are any pain points in its use. In many cases, the participants described the impact of increased CEP enrollment on their perceptions of the FRL metric. Each of the use cases are described next, organized by whether the use case is for reporting or for programs and funding.

FRL Metric Used for Reporting

OSPI Report Card

In accordance with the Every Student Succeeds Act, reporting by low-income (which is currently the FRL metric) is required. Low-income status is also a required demographic group for Career and Technical Education reporting under the Perkins V Act. The accountability system requires the state to track low-income students to see how they are performing academically and whether the targeted funding interventions are succeeding. OSPI reports on the percentage of low-income students by school and by LEA in the Washington State Report Card.[xiv]

Washington State Education Research & Data Center Reporting

The Washington State Education Research & Data Center (ERDC) fulfills data requests, creates data dashboards, and conducts research to better understand the education systems in Washington State.[xv] ERDC uses the FRL metric extensively for research and reporting on education outcomes for students of low income, for example examining rates of college

[5] Local education agencies (or LEAs) include school districts, charters, and State-Tribal Education Compacts.

enrollment for students who are and are not identified as FRL. Most of the reporting/research that ERDC does uses FRL eligibility as a proxy for low-income.

FRL metric used to report on outcomes of: Student groups, schools, LEAs, and state-wide

Concerns: If the state changes how it defines low income, this will inevitably impact the reporting results, making longitudinal comparisons challenging. All reporting will need to explicitly describe changes to the definition of low income, warning data users of the challenges comparing metrics before and after the definition change.

FRL Metric to Direct Programs and Funding

Child Nutrition Programs

USDA child nutrition programs use FRL data to determine individual student eligibility, program eligibility, and to allocate funding and resources. Programs that use FRL data to determine eligibility include:

- The Child and Adult Care Food Program "at-risk afterschool meal program"
- The National School Lunch Program Afterschool snack service
- The Summer Food Service Program[xvi] and Summer Seamless Option[xvii]
- The USDA Fresh Fruit and Vegetable Program[xviii]

FRL data is also used (as one factor) in child-nutrition grant programs including:

- National School Lunch Program Equipment Assistance Grants
- Meals for Kids Program: Elementary schools that have at least 30% of their students eligible for free and reduced-price meals are required to provide meals at no cost to all students in the school and are reimbursed with state funding.

FRL metric used to direct programming/funding to: Students, schools, and LEAs

Concerns: Since the FRL metric was developed for child nutrition programs, there are no concerns about its use for this use case.

College Bound Scholarship Program

The College Bound Scholarship (CBS) program is an early commitment of state funding intended to improve high school graduation, college enrollment, and completion rates for low-income students. The program provides awareness of available grant funding designed to alleviate financial barriers that prevent these students from considering college.[xix]

As of fall 2021, students are automatically enrolled in CBS if they attend a public school and are eligible for FRL in 7th or 8th grade, or newly eligible in 9th grade. Youth in foster care, or any youth who is a dependent of the state between 7th grade and high school graduation, are automatically enrolled. Private school and homeschool students can also apply. Even with the transition to automatic enrollment, eligible students must still fulfill the pledge requirements, which include: 1) Graduate from a Washington state high school with a 2.0 GPA or higher; 2) Not be convicted of a felony; and, 3) File a financial aid application, either the Free Application for Federal Student Aid or the Washington Application for State Financial Aid, during their senior

year of high school and each year they attend college to determine their income eligibility. Engaging with students who are eligible for CBS requires more than automatic enrollment. With the goal of helping low-income students identify and access aid for college, school staff and community providers are available to help students and families maintain eligibility and access the scholarship upon graduation.

FRL metric used to direct programming/funding to: Students

Concerns: Some low-income students might not be identified; thus they might not receive this aid.

National Board Teaching High Poverty Bonus

Under WAC 392-140-973,[xx] teachers working in high-poverty schools are eligible for additional compensation when they are National Board Certified, and FRL data helps determine which schools qualify.

FRL metric used to direct programming/funding to: Schools

Concerns: Some schools may appear to have fewer low-income students, thus reducing the number of teachers eligible for this bonus.

Washington School Improvement Framework

The Washington School Improvement Framework (WSIF) identifies how schools can improve the education of all students.[xxi] Schools are assigned a score of 1-10 based on as many as nine indicators, for all students and for student groups, including low income, as required by ESSA.[xxii] Schools identified as low performing can be elevated to the highest level of support (Tier 3). Schools not improving within a three-year cycle are prioritized for additional funding and interventions. Schools identified for Tier 3 support based on FRL are eligible for more significant intervention and funding. Schools that remain below this threshold after a three-year cycle receive elevated support. Schools are not typically identified for Tier 3 supports based on FRL alone.[xxiii]

FRL metric used to direct programming/funding to: Schools

Concerns: Changes in data collection raised concerns about how well the FRL metric identifies schools with high levels of poverty.

House Bill 1660 Program

House Bill 1660[xxiv] mandates that FRL data be used to provide reduced fees for extracurricular activities and sports programs for eligible students. This policy helps ensure that low-income students have equitable access to extracurricular opportunities. Students who are eligible for FRL must have their extracurricular fees waived automatically. LEAs that charge a fee for attendance at or participation in any optional, noncredit extracurricular event must adopt a policy for waiving all fees for students who are low income. The policy and regulations must also include how the LEA will reduce fees for family members and non-students over the age of 65, who by reason of their low income, may be unable to pay the fees to attend or participate in any

optional noncredit extracurricular LEA event which is of a cultural, social, recreational, or athletic nature.

FRL metric used to direct programming/funding to: Students

Concerns: Some low-income students might not be identified; thus their fees would not be waived.

Activity Grants

FRL data is used for activity grants, such as to rank high schools for funding through a specific grant aimed at offsetting Associated Student Body (ASB) losses. Schools participating in CEP are automatically given priority for funding. High schools with 60% or more FRL-eligible students were prioritized for funding in the previous year, while schools with less than 50% FRL are not invited to apply for grants in the current year. All high schools with ASB/athletic programs are required to develop a gap closure plan if applicable.

FRL metric used to direct programming/funding to: Schools

Concerns: With the 2022 changes to the CEP, schools may appear to have fewer low-income students, which can impact how grants and resources are distributed.

Required Action District

FRL is used in Required Action Districts (RAD), which focuses on the lowest-performing schools with the highest percentages of low-income students.[xxv] RAD schools are identified based on a combination of metrics, including FRL. Schools with higher percentages of FRL-eligible students receive additional support and funding allocations, which can amount to significant sums ($800,000 for a district in some cases). The FRL student group can directly trigger a school's identification into RAD status, leading to more extensive state support.

FRL metric used to direct programming/funding to: Schools

Concerns: None identified.

Washington Interscholastic Activities Association Classification

Washington Interscholastic Activities Association (WIAA) is a nonprofit organization and rule-making body formed to create equitable playing conditions among high school sports teams in Washington state.[xxvi] The organization groups high schools into classifications (based primarily on school enrollment) to ensure that they are able to compete fairly, and only those schools with the same classification can compete with each other. Historically, FRL has been used to adjust WIAA classifications,[xxvii] however, instead of using FRL in their classification process, WIAA now uses categorical eligibility to adjust enrollment for classifications.[xxviii]

FRL metric used to direct programming/funding to: Schools

Concerns: No current concerns. WIAA no longer uses FRL.

SNAP-Ed Program

SNAP-Ed programs focus on nutrition education and promoting healthier food choices among students. FRL data helps identify schools where at least 50% of students qualify for free or

reduced-price meals, which makes those schools eligible for SNAP-Ed programs. The program is approved to use CEP as eligibility so, those schools that are in the CEP are eligible for SNAP-Ed. The program needs to show that at least 50% or more of the students would qualify for SNAP or Medicaid or any means-tested federal assistance program. If FRL data were no longer available, they could work with their funders at the USDA to identify alternative metrics.

FRL metric used to direct programming/funding to: Schools

Concerns: As more schools have been participating in CEP, it makes qualifying schools easier. However, with the lower CEP threshold, prioritizing schools with the lowest income has become more difficult.

Federal Technology Funding

LEAs receive internet access and transmission service discounts from the federal government to support technology infrastructure through a program called E-Rate. The federal funding discount covers services on bringing the internet to schools. This discount is based on the FRL metric as determined by federal guidelines. **FRL metric used to direct programming/funding to:** LEAs

Concerns: Some LEAs may appear to have fewer low-income students, thus they might not receive this discount.

Learning Assistance Program

The school apportionment department sends out all the state funding using prototypical formula as directed by the Washington State Legislature. As a state-funded program, the Learning Assistance Program (LAP) uses FRL data in those calculations. LAP is designed to enhance educational opportunities for students through data-informed and evidence-based supplemental supports and services. LAP has two allocations, LAP base and LAP high poverty, which can fluctuate in response to FRL percentages.[xxix] FRL percentages at the LEA level help generate the LAP base allocation. This funding is intended to be flexible and can be allocated to schools in the LEA based upon identified needs. The LAP high poverty allocation is intended to supplement, rather than supplant, the LAP base allocation a school might normally receive. Schools are eligible for this supplemental allocation when they have a three-year rolling average of 50% FRL or more. (however, OSPI has proposed an amendment this calculation).[xxx]

LAP funding enables LEAs and schools to hire staff and implement supplemental supports and services to the students who need them, so it is important for this funding to be stable. Schools and LEAs that participate in programs like CEP or Meals for Washington Students may experience more difficulty in collecting family income information. To counteract these impacts, the Legislature passed hold harmless provisions for schools participating in CEP and Meals for Washington Students. These provisions protect participating LEAs and schools from losing funds because of decreases in their FRL percentages. More information on the specific provisions in place can be found in the Program Funding section of the LAP Guide (Updated Fall 2024). LEAs operating CEP should communicate with households the benefits of sharing family income information and how the data supports the LEA's State education funding and household qualification for Summer EBT and reduced fees.

FRL metric used to direct programming/funding to: Schools and LEAs

Concerns: Participation in CEP may lead to a decrease in the completion of applications, which in turn leads to inaccurate FRL data. Hold-harmless provisions are in place to attempt to reduce the impact of CEP participation and support consistent LAP funding.

Title I Funding

The Title I (Part A) program is the oldest and largest federal educational program. It provides supplemental instruction and support to help students meet academic and non-academic needs.[xxxi] School-level FRL data is crucial for determining how Title I funding gets dispersed to schools, to support schools with high numbers of low-income students. LEAs use FRL percentages to determine funding allocations to individual schools. Schools with higher percentages of FRL-eligible students may receive more Title I funds. In the Title I Part A application, LEAs may either use pre-populated FRL numbers or submit their own data that better reflect needs, depending on poverty levels in their schools.[xxxii]

Census Bureau data generates allocations for the LEAs, but the LEAs use their FRL numbers to allocate those funds to the schools. LEAs can either use the pre-populated numbers, which are the same numbers as those used for LAP, or they can enter their own number based on their own data. For the LEA allocations, the Census Bureau's Small Area Income and Poverty Estimates (SAIPE) data[xxxiii] combined with state-level foster student and subset of TANF data are used to calculate the Title I, Part A LEA-level poverty percent, which is then used to calculate the Title I, Part A LEA allocation. SAIPE is two years in arrears, meaning that data collected in one year will impact funding two years later.

FRL metric used to direct programming/funding to: Schools and LEAs

Concerns: Historically, FRL has been effective in reflecting low-income populations, but its usefulness is being questioned as CEP complicates data collection.

Alternative Methods of Identifying Low-income Students

Washington State is exploring alternative ways to measure student poverty, especially given the importance of this measure. As metrics that could potentially replace FRL or supplement it are considered, having a detailed analysis for each metric will make it easier to understand the various option's specific limitations, adaptations, usage, and reporting.

Small Area Income and Poverty Estimates

Developed by the U.S. Census Bureau, SAIPE provides district-level poverty estimates based on geographic areas rather than individual school enrollment. This census-based data is independent of school systems and therefore avoids certain biases in self-reported data. It does not rely on families completing forms and is an accurate representation of poverty levels in an entire school district. It does not, however, account for poverty variations within a school district. This approach to estimating the proportion of low-income students should not be compared directly to OSPI's current FRL metric because it is based on the income of the district, not enrolled students.

Limitations

SAIPE lacks school-level detail and does not reflect the mobility or specific characteristics of individual student populations. It is most useful for regional analyses but cannot provide the granularity required for targeted resource allocation at specific schools. In particular, this approach is not accurate for districts with income extremes.

State Adaptations

States like Washington consider SAIPE as a complementary data point, using it to get a broad view of LEA poverty levels while relying on other school-specific metrics for detailed insights. SAIPE is particularly valuable in LEAs where FRL or direct certification data may be skewed or incomplete.

Usage

SAIPE is used at an LEA level to provide a broad perspective on regional poverty, typically informing decisions around federal and state funding allocations. It is not used for individual school funding due to its lack of granularity.

Reporting

SAIPE data is collected and reported by the U.S. Census Bureau and provides estimates based on geographic areas rather than individual students. This data is updated annually and is often combined with other local indicators for more refined analysis.[6]

Data Sources

Generated by the U.S. Census Bureau, SAIPE integrates:

- Data from the American Community Survey (ACS)
- IRS income tax filings
- SNAP participation records
- Population estimates from the Census Bureau
- Small-area poverty and income statistics, primarily at the district level

Update Frequency

- Released annually, using the most recent ACS data combined with administrative records.
- Reflects poverty statistics for the most recent year but does not provide real-time adjustments.

Reflection of School-aged Population

SAIPE explicitly includes estimates for the school-aged population (5-17 years), making it more targeted for educational funding purposes than broader census measures. However, the estimates are district-level averages, which may dilute variations within districts and fail to reflect individual school or neighborhood disparities.

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[6] The American Community Survey, the US Census Bureau's primary data source is mailed to a sample of residential addresses every month. Roughly 3.5 million addresses are sampled annually, and approximately every 5 years, each residence is sampled. As such, census data across the US is regularly updated on a rolling basis. SOURCE: census.gov/programs-surveys/acs/about/information-guide.html

Advantages

- **District-Level Precision**: Provides an overview of poverty at the school district level, aligning closely with funding and resource allocation needs.
- **Incorporates Multiple Data Sources**: Combines several datasets, increasing accuracy and reliability over single-source metrics.

Limitations

- **Lack of Granularity**: Does not provide school-specific or student-level poverty data, limiting its use for targeted interventions.
- **Reliance on District Boundaries**: Assumes students attend schools within their assigned district, which may not hold true in areas with extensive school choice or charter schools.

Neighborhood Socioeconomic Status

This method, which would need to be developed for the state of Washington, could capture socioeconomic data at the neighborhood level by analyzing census block information, such as income levels, mobility rates, and education levels. It would provide a broader view of economic and social risk factors that may impact students' educational outcomes, beyond mere income. This approach has the potential to uncover localized areas of poverty in urban areas.

Limitations

SES data can be challenging to implement in rural areas where census blocks cover larger and more economically diverse regions, potentially masking localized poverty. Additionally, gathering and aligning neighborhood data with school records can be resource-intensive, particularly for districts lacking robust administrative support. This approach may be less accurate in areas (such as rural areas) with PO boxes because they are not linked to a physical address, making it challenging to accurately map to a geographic area. SES metrics rely on physical addresses to gather neighborhood-level data. Finally, unhoused students may not be accurately captured using this method as they may live a good distance from their school.

State Adaptations

Colorado plans to integrate a neighborhood SES (nSES) metric into its funding model by matching student addresses with census data, aiming to better identify high-need neighborhoods. This approach allows Colorado to consider broader socioeconomic factors, which can be particularly helpful in identifying pockets of need that categorical eligibility might miss.

Usage

Neighborhood SES is used to identify economic disadvantage based on neighborhood characteristics, considering factors such as income levels, mobility rates, and educational attainment in the area where students reside. It's designed to go beyond individual income data to reflect a community's socioeconomic context. It is a continuous metric and combines household income, educational attainment, mobility, and household density to develop this composite measure.

Reporting

Neighborhood SES metrics are often reported by matching student addresses with census block data, with outcomes aggregated at the school or district level. This neighborhood-based data is used to identify at-risk students who might not qualify under traditional income criteria.

Data Sources

Derived from **census tract-level data** provided by the U.S. Census Bureau's **ACS**. Includes indicators such as:

- Median household income
- Educational attainment levels
- Unemployment rates
- Housing stability and occupancy

Data may also incorporate proprietary datasets for finer granularity or specialized analyses.

Update Frequency

Updated annually through the ACS's 1-year or 5-year estimates; the 5-year estimates are particularly valuable for small or rural areas where single-year data may be less reliable due to smaller sample sizes.

Reflection of School-Aged Population

Neighborhood SES provides an indirect reflection of the school-aged population by associating students with the socioeconomic characteristics of their residential neighborhoods. While neighborhood data often aligns with community demographics, it assumes that students attend schools within their census tract, which may not always be true due to school choice, charter schools, or inter-district enrollment.

Advantages

- **Broad Socioeconomic Context**: Captures additional dimensions of disadvantage beyond income, such as parental education and housing conditions.
- **Non-intrusive**: Does not require individual family disclosure, reducing privacy concerns.

Limitations

- **Geographic Mismatch**: Rural census tracts are larger and may encompass diverse populations, masking disparities within a single area.
- **School Choice Impact**: May inaccurately link students to neighborhood SES characteristics if they attend schools outside their residential census tract.

Categorical Eligibility Only

This approach used by Rhode Island removes reliance on household income or a meal application. They use participation in SNAP, TANF, Medicaid, experiencing houselessness, and being in foster care to directly certify individual students. For funding decisions at the school and district level, they multiply the number of directly certified students by 1.6 to take into account the known undercount using the categorical eligibility method.

Limitations

This approach misses individual students who are eligible for FRL due to family income, but are not automatically identified through their categorical eligibility.

State Adaptations

Rhode Island adjusts funding to school districts through a quadradic means approach. Those districts that have a higher proportion of low-income students (as determined by the categorical eligibility approach described above) receive additional funding support from the state, to adjust for lower income through property taxes.[xxxiv]

Usage

This approach avoids reliance on household income forms and is intended to allow for stable, predictable funding to schools and districts.

Reporting

The categorical eligibility information is received from the Rhode Island Department of Health and Human Services and the Rhode Island Department of Education in-house databases.

Economic Disadvantage Indicator

Used by Michigan, this approach is a composite measure that includes multiple criteria such as participation in SNAP, TANF, Medicaid, houselessness, and foster care, along with information from household meal applications. The indicator uses multiple sources of data at the student level. All of the data obtained to inform this indicator are obtained by state or local agencies. This approach is similar to the one Washington state uses.

Limitations

Although this indicator aggregates multiple data sources, it often reduces them to a binary classification of “economically disadvantaged” or not, which limits the granularity that could be achieved with more nuanced poverty levels. In addition, data-sharing and updating agreements between social services and education departments can pose challenges.

State Adaptations

Michigan's indicator is directly applied to individual students, facilitating targeted interventions. Michigan provides school meals universally, and as such, it is especially challenging to collect meal applications. In response, the state modified its form and encourages all families to complete it. They are also considering how to use income tax data to reduce their reliance on meal application forms.

Usage

This composite measure incorporates multiple criteria—such as FRL, SNAP, TANF, Medicaid, and houselessness—to identify economically disadvantaged students. It is often used for state funding formulas and program eligibility. Michigan consolidates various data points into a single indicator, streamlining the identification process.

Reporting

States (including Michigan and Washington) collect and report data through a combination of Direct Certification (a categorical eligibility process defined by the federal government) through Health and Human Services, other categorical eligibility identification through social service databases, and Department of Education internal databases.

Students Experiencing Poverty Metric

The approach used in Oregon, Students Experiencing Poverty (SEP) metric, was developed in response to the limitations of FRL in CEP schools. This metric identifies students experiencing poverty based on state assistance program data, such as SNAP, TANF, foster care, and houseless services, reducing the burden on schools to collect income data. Like Washington, Oregon's SEP metric offers a more comprehensive view by integrating multiple sources of data at the student level.

Limitations

SEP depends on state-level data-sharing agreements, which may limit the school districts' access to detailed, student-specific information due to privacy concerns. Vulnerable groups, such recent immigrants, may not appear in state assistance data, leaving some low-income students undercounted.

State Adaptations

Oregon's SEP metric is directly applied to focal student groups, facilitating targeted interventions.

Usage

Oregon's SEP metric identifies students in poverty by using data from state assistance programs (e.g., SNAP, TANF, migrant education, foster care, and houselessness). It's particularly valuable in schools participating in CEP, where FRL data may be unreliable. Oregon consolidates various data points into a single metric, streamlining the identification process.

Reporting

SEP data is reported by the Oregon Department of Human Services, aggregated at the district level to protect privacy. This ensures schools receive information about student need without requiring them to collect income data themselves.

As described above, how states automatically identify students as low-income varies. The categories that different states use to automatically identify students as low-income is detailed in Table 1.

Table 1: Comparison of Automatic Identification (categorical eligibility) Approaches

Category	Oregon	Colorado	Massachu-setts	Michigan	Rhode Island	Washington
SNAP	X	X	X	X	X	X
TANF	X	X	X	X	X	X
Medicaid		X	X	X	X	X
FDPIR						X
ECEAP						X
Foster child	X		X	X	X	X
Houseless	X	X	X	X	X	X
Migrant	X	X		X		X
Runaway		X				
Head Start		X				X

Highly Mobile[7]						
Current or former WIC[8] **recipient**						

Key Insights from Interviews

FRL and Categorical Eligibility

FRL as a proxy for low-income is commonly used and well-understood. However, with the implementation of CEP and other meal program changes there are concerns about the decrease in identifying low-income students and how accurately the FRL metric represents their numbers.

Categorical Eligibility provides a feasible way to identify students on public-assistance programs and avoids reliance on family meal application and income forms. However, it does not include all students from low-income households, limiting its comprehensiveness. In some cases, states call their categorical eligibility process "Direct Certification". Although the federal definition of Direct Certification is specific,[9] many states use the term to describe an approach whereby students are automatically flagged as low income, based on enrollment in particular government programs or inclusion in particular student groups – what is more broadly understood as categorical eligibility. Although none of the states that we included in our study currently use highly mobile and current or former receipt of WIC as items to include in categorical eligibility, we heard that they are additional criteria being considered which may help automatically flag students as low-income.

Alternative Metrics

Neighborhood SES is beneficial for capturing broader socioeconomic conditions, particularly in urban areas with small census tracts—though it lacks accuracy in rural areas and may violate privacy with large census tracts—whereas **SAIPE** provides a stable but broad view of district poverty levels.

Some states determine whether a student is low income (or in a particular income bracket) through the **state income tax** data. This method is not feasible in Washington state, because there is no state income tax.

Family income fluctuates and students who are **persistently living in poverty** face more disadvantages than those who do not.[xxxv] As such, some states are considering including persistent exposure to poverty in their low-income analysis. However, there are limitations to fairly applying this metric, especially for younger students who have not had their poverty exposure tracked for several years.

[7] Highly mobile students are those who experience multiple schools during their k-12 education outside of their regular grade promotion.
[8] USDA's Special Supplemental Nutritional Program for Women, Infants and Children
[9] The federal government defines Direct Certification in 7CFR 245.6(b).

The National Assessment Governing Board is implementing a new method of determining the socioeconomic status of students, adding a measure of how many books are in a student's home and parental education.[xxxvi]

Combined Approaches

Approaches combining multiple sources and methods of identifying low-income students (e.g., categorical eligibility, SES, census data, family income forms) like the one used in Washington State--was recommended by several experts. Such approaches have the potential to capture a broader and more accurate picture of student poverty. However, it requires complex data management and faces privacy and logistical challenges. States like Colorado, Oregon and Michigan which also use a combined approach stated that merging data from different sources can lead to duplication, errors, or missing information, especially when identifiers (e.g., student IDs or addresses) do not align across datasets. For example, rural areas where students have PO boxes instead of residential addresses create significant hurdles for geocoding and integrating neighborhood-level data.

Ways of Determining Who is Low Income

Some states use one approach to determining low-income students, schools, and districts. For example, applying the FRL metric to programming and funding for low-income students, low-income schools, and low-income districts. However, many states use different sources of data to define low income, depending on the use case. For example, Colorado primarily uses FRL as a proxy for low income, but is starting to use geographic data to help determine which schools are low income, which they intend to use alongside the FRL data to direct at-risk funding for schools.

Adjusting Washington's Low-income Limits

Currently the FRL system in Washington state uses the federal USDA income guidelines to define low income. The income limits do not take into account differences in the cost of living across the country or across the state.[10]

Analysis and Recommendations

Analysis of Current State

OSPI staff have worked diligently and creatively throughout the years to improve accuracy of the FRL metric as it is so widely used for programming and funding decisions within the state (which is also true for many other states). The FRL metric was never intended to be used to identify low-income students, but rather to direct USDA-funded child nutrition programming. However, the FRL metric is readily available and has been used historically—it is the

[10] Please note that one scholar cautioned against the use of cost-of-living measures to allocate school or LEA-level funding because it is preferrable to adjust for things the LEAs are paying for—primarily labor. A cost-of-labor index would be more fruitful to examine than a cost-of-living index, to adjust school and LEA level funding.

benchmark and though imperfect, it is accepted. Nonetheless, USDA requirements limit how FRL data can be collected, making the metric a fragile proxy for low income because of historical limitations to how it can be collected.

Analysis of Alternative Metrics

With Washington considering alternatives to the traditional FRL metric, this analysis synthesizes expert insights on several metrics, their usage, strengths, and limitations. The goal is to support OSPI in selecting a metric that accurately identifies low-income students, aligns with the state's funding priorities, and meets the needs of its diverse student population. The most promising metrics for each of the use cases are in Table 2. For some use cases, one promising measure is highlighted in soft gold and 1, and in some cases a second promising measure is also identified with light teal highlighting and 2.

Recommendations

Continue using the current system of categorical eligibility plus the household income/meal application form for programs targeting individual students and families. The current approach, using the CNEEB form, may increase the number of students who are correctly identified as low income. The current USDA policies allow for the use of the form in all schools, and some other states (for example, Massachusetts), have developed similar approaches. However, data does not yet exist regarding whether this new approach will increase the accuracy of the FRL metric and properly account for low-income students who are not identified through categorical eligibility. In addition, the USDA may change its programs and policies in the future, making this solution fragile.

Use SAIPE to identify low-income rates for LEA-level programs to direct programs and funding such as Title 1 funding, and LAP funding. SAIPE is more sensitive at higher rates of poverty, whereas the FRL metric is not. At LEA-level funding decisions, SAIPE is used for some LEA-level programs (such as Title 1 funding which the SAIPE was designed for),[xxxvii] but not others. Examining the feasibility of transitioning all district-level programs that target low-income LEAs to the SAIPE approach is recommended.

Explore developing an nSES measure to allocate school-level funding. The nSES measure takes district-level census data and combines it with school-based data to develop an estimate of the proportion of low-income students in each school. Neighborhood SES metrics are typically developed by individual states or local governments based on their specific data needs and available resources. The process can vary from state to state, but generally involves using existing data sources such as:

- Census Data: Most states rely on data from the ACS, which includes a variety of socioeconomic indicators such as income levels, education attainment, and employment rates at the neighborhood level. This can help to create an SES index for a given geographic area (e.g., census tracts or blocks).

- School-level Data: States might also combine SES data with school-level information such as participation in FR programs or other student demographics to refine the SES measure at the neighborhood level.

Table 2. Comparison of Promising Low-income Measures

Use Case	SAIPE	Categorical Eligibility only	Categorical Eligibility + form	Neighborhood SES (nSES)
Washington State Report Card			1	
ERDC Reporting			1	
Child Nutrition Programs			1	
CBS Program			1	
House Bill 1660			1	
Teaching Bonus*		2		1
WSIF		2		1
Activity Grants		2		1
RAD Schools		2		1
SNAP-Ed Program		2	1	2
Federal Technology Funding	1			
Title 1 Funding	1			2

Legend: Most promising measure, Second most promising measure (optional)

CBS: College Bound Scholarship Program
*Bonus for teachers working in high-poverty areas
WSIF: Washington School Improvement Framework
RAD: Required Action District

Learning Assistance Program	1			2

Explore whether national low-income guidelines are applicable to all areas of the state, and whether other low-income thresholds should be used, given the high cost of living in many areas of the state. Oregon, for example, adjusts the poverty threshold to reflect geographical differences in housing costs.

Consider using a sliding scale of poverty for LEAs, to account for concentrated poverty and ensure additional funding reaches those schools. For example, Texas uses multiple measures to create an index of the economic classification of the geographic region where they can put students into groups of one to five and determine the neighborhood poverty context. This approach targets impoverished regions, not impoverished families.

The summer EBT regulations from the USDA suggest that each state has a database to manage students who are eligible for summer EBT. Washington state has no central database, but several databases are shared between agencies and departments. **A centralized database for data entry, collection, and reporting would simplify data sharing** and significantly improve data accuracy. Right now, some OSPI staff believe that the most vulnerable students are being missed, and a centralized database would likely address that.

If the state chooses to change its definition of low income for accountability and reporting purposes, it should **be transparent** that the definition has changed so researchers and the public understand that any differences in reported academic outcomes among low-income students may be influenced by the revised definition of low income. Additionally, if the state changes its definition of low income for funding allocation to LEAs, it should consider a hold-harmless provision to protect schools from downward swings in funding due to changes in the definition of low income. Washington state has used such provisions multiple times in the past.

Explore (and statistically model) additional datasets and student groups to include in categorical eligibility. Another student group to consider including is those who are highly mobile or are or were a WIC recipient. Adding such categories to categorical eligibility should be examined to determine its impact on the measure and the feasibility of obtaining and integrating the data.

Understand that other alternative measures exist (ones not used by the states included in this study) and would require additional research before a recommendation could be made. These measures are less commonly used and less readily available. They include: income tax data (in Washington, state income tax is not collected however, IRS federal income tax data may be a source to determine family income—although there are privacy issues with obtaining and using this data), parent education level, high mobility (an indicator of instability), and early exposure to poverty (most easily measured through receipt of WIC).[xxxviii]

Prioritize ongoing stakeholder engagement. Stakeholder hesitancy was noted in transitioning from FRL data as a metric, as it has been embedded in various educational support programs. A gradual transition to a new model, coupled with training for school administrators and outreach to families, could mitigate concerns.

Limitations

This analysis describes the use of the FRL metric within Washington state while providing a summary of alternatives used by other states to measure low income. How those alternatives could work for the Washington state ecosystem are explored. There are a few limitations of note to this work. First, there may be errors in how the team interpreted the shared knowledge of experts and professionals on this topic. Second, while multiple experts from a single state, organization, or department contributed, the perspectives may be limited to each context, potentially overlooking broader, diverse viewpoints. Finally, limited exploration or depth in evaluating the alternative approaches was shared due to time constraints and data availability. While recommendations are made, it is difficult to generalize from one state to another when considering different policies, demographics, or needs. To balance these limitations, we suggest alternative approaches for modeling, piloting, or further investigation into potential solutions. Moreover, a change management approach could be used to improve adoption, consistency between LEAs, and the ultimate success and sustainability of the implemented change.[xxxix]

Conclusion

The FRL metric is widely used across OSPI and other Washington state agencies. This metric serves as a widely used proxy for low income status, highlighting an important role in identifying students at risk of economic deprivation – an established factor linked to poor academic outcomes.[viii] Though, this approach and use of the FRL metric may oversimplify the complexity of socioeconomic status and its impact on student achievement. As such, the FRL metric has been used to help identify which students, schools, and LEAs should receive specific or additional programming or funding, to improve academic outcomes. The FRL accuracy when used as such a proxy does fluctuate as USDA programs and policies change.

It is recommended that Washington State continue to use their FRL metric for programs and funding targeted at individual students (including, most importantly, child nutrition programs, for which it has been established). However, to disentangle other funding and programming targeted to low-income schools and or LEAs from USDA policies, it is recommended that other approaches be used for programming and funding targeted to low-income schools and LEAs. Some other states follow this practice. The details follow.

At the school level, the nSES approach, although challenging to develop and administer, could be an accurate method of identifying low- income schools because it could look at the economic conditions at each individual school. This approach does not depend on families filling out forms and it will not be impacted by any future USDA policy changes regarding CEP eligibility.

At the LEA level, using SAIPE is an accurate method for identifying low income and does not rely on families filling out forms. Currently, Title I funding is allocated using this approach. LEAs then use the FRL percentage in schools to allocate funding between schools. It is recommended that funding allocation for low-income LEAs continue to use SAIPE but use categorical eligibility—and potentially a robust categorical eligibility approach, that captures more low-income students—to allocate funding between schools within LEAs. Alternatively, districts could use an nSES measure to allocate funding between schools. Both of these methods eliminate dependence on family meal/income applications, meaning that low-income metrics will not be dependent on USDA policies and programs.

These recommendations are based on a qualitative analysis of the state's landscape. A quantitative analysis, which models the impact of various approaches would supplement this initial analysis. Moreover, before changes are made, piloting any new approach is necessary to determine feasibility and impact, to avoid state-level shifts and implementation challenges.

Appendix A: Research Questions and Criteria

The Organization for Economic Co-operation and Development[xl] has defined six criteria to use as a framework for examining an intervention, policy, strategy, program, project, or activity. This framework may serve as a foundational basis upon which to make judgments about the progress, success, or impact of the item being examined. The six criteria are as follows:

- **Relevance** assesses whether the intervention is doing the right things to respond effectively to key stakeholders.
- **Coherence** assesses whether the intervention is a good fit and compatible with other institutions and interventions.
- **Effectiveness** assesses whether the objectives of the intervention have been achieved and describes any progress made toward achieving them.
- **Efficiency** asks whether the intervention is achieving its objectives in a sustainable and timely manner.
- **Impact** assesses the intervention's outcomes and describes any intended or unintended broader effects.
- **Sustainability** assesses whether the intervention's benefits will continue beyond the timeframe of the intervention.

Appendix B: Research Plan

Research Scope

Objective 1: Assess how the current metric is used to drive funding decisions and or policies and determine whether and how the metric aligns with OSPI's strategic goals.

- Which programs use this metric to drive funding decisions and to which decisions does this apply?
- How do programs use this metric to drive funding decisions and or policies? (e.g., eligibility thresholds)
- How well does the FRL metric effectively fulfill its designated purposes? (e.g., distribution of funds to low-income populations)
- What are the current metric's strengths and limitations?

Objective 2: Identify and or develop alternative funding metrics that are more aligned with OSPI's strategic priorities and overcome any gaps identified in the current metric.

- What other metrics are being used to capture this information and drive similar funding decisions?
    - Identify practical, feasible metrics that can be generalized across programs
    - Determine whether the current FRL metric can be maintained but made more useful in combination with another metric
- What are the strengths and limitations of each alternative metric?
- What populations do they capture?

Research Questions and Criteria

The research questions for each objective, along with the evaluation using the criteria established by the Organization for Economic Co-operation and Development[11] are in Table 3. See Table 4 for the methods used to collect data, and Table 5 for a list of data collection instruments.

[11] OECD. (2024). *DAC criteria for evaluating development assistance*. OECD. web-archive.oecd.org/temp/2024-05-13/81829-daccriteriaforevaluatingdevelopmentassistance.htm

Table 3. Research Questions, Criteria, and Relevant Objective

Objective	Research Questions	Criteria
1	Which programs use this metric to drive funding decisions and to which decisions does this apply?	Relevance, coherence
1	How do programs use this metric to drive funding decisions and or policies? (e.g., eligibility thresholds)	Relevance, coherence
1	How well does the FRL metric effectively fulfill its designated purposes? (e.g., distribution of funds to low-income populations)	Effectiveness
1	What are the current metric's strengths and limitations?	Effectiveness, efficiency, impact
2	What other metrics are being used to capture this information and drive similar funding decisions?	Relevance, coherence
2	What are the strengths and limitations of each alternative metric?	Effectiveness, efficiency, impact

Data Sources and Tools

Table 4. Methods for Collecting Data

Data Collection Method	Audience	Reasoning
Focus group (90 minutes each, virtual focus group with one KAI facilitator and one KAI notetaker)	OSPI staff One focus group n=15	To understand how OSPI staff and programs are using the FRL metric
	WA State staff One focus group n=12	To understand how other WA State staff and programs are using the FRL metric
Key informant interviews (30-60 minutes each, virtual interview, with one KAI facilitator)	Out-of-state experts N=5 interviews	To gather information on alternative metrics that are used outside of WA state for similar purposes
	WA State staff N=1	To gather information on alternative metrics that other WA State staff and programs are using to fulfill the same purposes

Data Collection Instruments

The data collection instruments, aligned with the research questions are described in Table 5 and Table 6.

Table 5. Data Collection Instruments Objective 1

Objective 1		
Research Questions	**Participants**	**Focus Group Questions**
Which programs use this metric to drive funding decisions and to which decisions does this apply?	OSPI, WA staff	Which programs does your team currently use the FRL metric for? How is the FRL metric used within those programs? For example, to drive program decisions such as incentives or waivers. Are you aware of programs that provide meals at no cost? Probe: *If so, what do you know about the Community Eligibility Provision or CEP?* The CEP was implemented in 2012. It was updated during the pandemic. Probe: *Have you observed any effects on your programs?*
How do programs use this metric to drive funding decisions and or policies? (e.g., eligibility thresholds)	OSPI, WA staff	When using the FRL metric within programs or for funding decisions, how is it used to drive policies and decisions, or to inform programs? For example, is there a certain eligibility threshold for funding or grants? Probe: *What are those thresholds or triggers, and what happens once a threshold is reached?* What do you know about why the FRL was selected as the metric used for these programs/decisions? Probe: *Was it more accurate, complete, or valid than other metrics? Were other metrics considered?*
How well does the FRL metric effectively fulfill its designated purposes?	OSPI, WA staff	Do you feel that this metric accurately reflects the population it is intended to capture?

Objective 1		
Research Questions	**Participants**	**Focus Group Questions**
(e.g., distribution of funds to low-income populations)		Probe: *If no, why not? For example, is there a certain population that is not captured within the metric?* Probe: *At the school level, does the metric reflect the population of that school and its student body?* How has the increase in meals provided at no cost impacted your ability to accurately or confidently use FRL for its intended purposes? Probe: *How has that changed since implementation of the CEP?* How do you define and measure effectiveness of the FRL metric?

Table 6. Data Collection Instruments Objective 2

Objective 2		
Research Questions	**Participants**	**Interview Questions**
What other metrics are being used to capture this information and drive similar funding decisions?	Out-of-state experts, WA staff	For all: How does your organization/state use the FRL metric? Probe: *How does your organization/state use the FRL metric to develop funding formulas or policy decisions?* Probe: *Besides funding, are there any other purposes for which your organization/state uses the FRL metric?* In what ways, if any, has the implementation of programs that provide meals at no cost affected the collection of FRL data? What options exist for replacing the FRL metric or substituting a different metric? Probe: *How were these options identified?*

Objective 2		
Research Questions	**Participants**	**Interview Questions**
		Probe: *Have any of these options been put into place yet?* Are there other innovative options for alternative methods that you are aware of and have not yet been implemented? Probe: *If so, what might prevent them from being implemented?* For national organizations: In what ways have they been researched to determine if they are an effective replacement? [recognizing the different uses] For other states: What did your state do to replace or supplement the FRL data collection to better capture the status of low-income students? For WA staff: If there is a gap in data due to more programs providing meals at no cost, what options have your office considered as a substitute or supplement for FRL data to drive policies, grants, and funding models?

Objective 2		
Research Questions	**Participants**	**Interview Questions**
What are the strengths and limitations of each alternative metric?	Out-of-state experts, WA staff	The FRL metric is intended to be a measure that can accurately capture low income students at the school or local level. There may be alternative metrics that can be used to capture the same information. For alternative metrics, why was it selected as the metric to be used for these programs/decisions? Has the metric been evaluated to assess its accuracy in comparison to the FRL metric? Probe: If yes, what did that evaluation consist of? How did implementation of the new metric(s) go? Probe: How did staff and stakeholders react to the new metric? What lessons did you learn during implementation of the new metric(s)? What would you say the strengths of the metric(s) are? What are the limitations of the metric(s)?

Appendix C: Focus Group Discussion Guide

Interviewed by:

Date:

Hello, my name is <<NAME>>. I am <<POSITION/ROLE>> with Kauffman and Associates, Inc., a Native American, woman-owned small business based in Spokane, Washington.

Thank you for agreeing to talk with us today. The purpose of our discussion is to understand how Washington state's programs use the current free and reduced lunch (FRL) metric to drive funding decisions or develop funding formulas. We hope this discussion will help us better understand your program's or department's use of the FRL metric. We are also interested in exploring whether the FRL metric has changed since the implementation of more programs that provide access to free meals to students, and any lessons learned or challenges you've encountered while using the metric within your projects. We'll use the information from this discussion to inform our evaluation of the metric, and it will also inform the consideration of alternative metrics and their alignment with the current use of the FRL metric. The main objective of this evaluation is to understand whether the FRL metric is still effectively capturing low-income status of students, and if not, identify what other metrics are available that would effectively and accurately capture such data.

I'm going to ask you some questions, which you can answer in any way you wish. Please raise your hand, or add your question to the chat, and we will call on you. Please feel free to elaborate on any of your points. If a question is unclear, stop me at any time and ask me to explain. You may also choose to skip any question or end your participation in the focus group at any time. Participation is completely voluntary. Information and feedback from these discussions will be used in the examination of the FRL metric. All audio recordings will be deleted after they are transcribed. All information from our discussion will be kept private and confidential, and names will not be used in the final evaluation. Information will be presented in aggregate, so no identifiable information will be apparent.

For today's discussion, I would like to record the meeting. Is it OK if I record our discussion? Feel free to turn your camera off or change your name. <<Moderator requires oral consent from each participant to record in order to record. If someone does not consent to being recorded, the discussion will not be recorded, and KAI will rely on the notes taken.>>

Where the FRL Metric is Used (40 minutes)

1. First, could you please introduce yourselves and your role. [Moderator goes around the room, inviting each person to introduce themselves.]
2. Which programs does your team currently use the FRL metric for?
3. How is the FRL metric used within those programs? For example, to drive program decisions such as incentives or waivers.

4. Are you aware of programs that provide meals at no cost? *Probe: If so, what do you know about the Community Eligibility Provision (CEP)?*
5. The Community Eligibility Provision (CEP) was implemented in 2012. It was updated during the pandemic and used more widely throughout Washington state. *Probe: Have you observed any effects on your programs with the increase in meals provided at no cost?*

How the FRL Metric is Used (20 minutes)

1. When using the FRL metric within programs or for funding decisions, how is it used to drive policies and decisions, or to inform programs? For example, is there a certain eligibility threshold for funding or grants?
   Probe: What are those thresholds or triggers, and what happens when a threshold is reached?
2. What do you know about why the FRL selected as the metric to be used for these programs/decisions? *Probe: Was it more accurate, complete, or valid than other metrics? Were other metrics considered?*

Alignment of FRL Metric with OSPI's Strategic Goals (30 minutes)

1. Do you feel this metric accurately reflects the population it is intended to capture? Probe: If no, why not? For example, is there a certain population that is not captured within the metric? *Probe: At the school level, does the metric reflect the population of that school and its student body?*
2. How has the increase in meals provided at no cost impacted your ability to accurately or confidently use FRL for its intended purposes? *Probe: How has that changed since implementation of the CEP?*
3. How do you define and measure effectiveness of the FRL metric?

Those are all the questions I have for you today. Thank you for sharing your time and knowledge with us. We appreciate the chance to learn about your work with OSPI and the FRL metric, and we look forward to sharing the results of this evaluation with you after it has been completed.

Time Ended: _____

Appendix D: Individual Interview Discussion Guide

Interviewed by:

Date:

Hello, my name is <<NAME>>. I am <<POSITION/ROLE>> with Kauffman and Associates, Inc., a Native American, woman-owned small business based in Spokane, Washington.

Thank you for agreeing to talk with us today. The purpose of our discussion is to understand how Washington state's programs use the current free and reduced lunch (FRL) metric to drive funding decisions or develop funding formulas. We hope this discussion will help us better understand your program's or department's use of the FRL metric. We are also interested in exploring whether the FRL metric has changed since the implementation of more programs that provide access to free meals to students, and any lessons learned or challenges you've encountered while using the metric within your projects. We'll use the information from this discussion to inform our evaluation of the metric, and it will also inform the consideration of alternative metrics and their alignment with the current use of the FRL metric. The main objective of this evaluation is to understand whether the FRL metric is still effectively capturing low income status of students, and if not, identify what other metrics are available that would effectively and accurately capture such data.

I'm going to ask you some questions, which you can answer in any way you wish. Please feel free to elaborate on any of your points. If a question is unclear, stop me at any time and ask me to explain. You may also choose to skip any question or end your participation in the interview at any time. Participation is completely voluntary. Information and feedback from these discussions will be used in the evaluation of the FRL metric. All audio recordings will be deleted after they are transcribed. All information from our discussion will be kept private and confidential, and names will not be used in the final evaluation. Information will be presented in aggregate, so no identifiable information will be apparent.

For today's discussion, I would like to record the interview. Is it OK if I record our discussion? Feel free to turn your camera off or change your name first. (Moderator requires oral consent from each participant to record before proceeding with the recording. If the participant does not consent to being recorded, proceed with notetaking only.)

Understanding the FRL Metric (30 minutes)

1. First, could you please introduce yourself and your role.
2. How does your organization/state use the FRL metric? *Probe: How does your organization/state use the FRL metric to develop funding formulas or policy decisions? Probe: Besides funding, are there any other purposes for which your organization/state uses the FRL metric?*

3. In what ways, if any, has the implementation of programs that provide meals at no cost affected the collection of FRL data?
4. What options exist for replacing the FRL metric or substituting a different metric? *Probe: How were these options identified? Probe: Have any of these options been put into place yet?*
5. Are there other innovative options for alternative methods that you are aware of and have not yet been implemented? *Probe: If so, what might prevent them from being implemented?*

For national organizations

In what ways have they been researched to determine if they are an effective replacement?

Questions for other states

What did your state do to replace or supplement the FRL data collection to better capture the status of low income students?

For WA staff

If there is a gap in data due to more programs providing meals at no cost, what options does your office consider as a substitute or supplement for FRL data as a driver for policies, grants, and funding models?

Strengths/Limitations of Alternative Metrics – for National Organizations and Out-of-State Experts (20 minutes)

The FRL metric is intended to be a measure that can accurately capture low income students at the school or local level. There may be alternative metrics that can be used to capture the same information.

1. For alternative metrics, why was it selected as the metric to be used for these programs/decisions?
2. Has the metric been evaluated to assess its accuracy in comparison to the FRL metric? *Probe: If yes, what did that evaluation consist of?*
3. How did implementation of the new metric(s) go? *Probe: How did staff and stakeholders react to the new metric?*
4. What lessons did you learn during implementation of the new metric(s)?
5. What would you say the strengths of the metric(s) are?
6. What are the limitations of the metric(s)?

Those are all the questions I have for you today. Thank you for sharing your time and knowledge with us. We appreciate the chance to learn about your work with the FRL metric, and we look forward to sharing the results of this evaluation with you after it has been completed.

Time Ended: _____

Appendix E: Outcomes of State Discussions and Document Review

During this analysis, six states—Colorado, Oregon, Massachusetts, Vermont, Rhode Island, and Michigan—were consulted regarding how they have adapted to the change in the FRL metric. This next section highlights the questions asked and each state expert's verbal response. At times, additional documentation was provided or sought by the research team, which has also informed the responses.

How does the state capture the status of low-income students?

Colorado

FY 23-24: HB22-1202 created a new at-risk measure to identify students at risk of below-average academic outcomes due to socioeconomic disadvantage or poverty. The measure included a district's percentage of students eligible for free lunch based on receipt of public benefits like SNAP, TANF, Food Distribution Program on Indian Reservations, or categorical eligibility (foster, houseless, migrant, runaway or Head Start). This was supplemented by Direct Certification of students participating in Medicaid or children's basic health plan. The measure also included a neighborhood socioeconomic status index that weights students' needs based on at least five socioeconomic status neighborhood factors, linked to each student's census block group.

Oregon

The state's current approach for calculating FRL[12]—the NSLP determines free and reduced meal eligibility based on:

- Participation in federal assistance programs such as SNAP
- Status as a houseless, migrant, runaway, or foster child
- Children enrolled in a federally funded Head Start program, or a comparable state-funded pre-kindergarten program
- Children from families with incomes at or below 185 percent of the Federal Poverty Level

Massachusetts

The most commonly used metric for measuring income status has been eligibility for free or reduced-price meals under the USDA's school nutrition program. Families submit application forms documenting their household income. If the income falls below certain levels set by

[12] SOURCE: oregon.gov/ode/students-and-family/equity/Latinx/Documents/03%20ODE%20Current%20Economically%20Disadvantaged%20Measure.pdf

USDA, students in that family can receive free or reduced-price school breakfasts and lunches. Under long-standing U.S. Department of Education guidance, these students are then recorded as "low income" for purposes of educational statistics.

Vermont

Vermont began participating in the USDA Medicaid Direct Certification Demonstration Project in August 2024. This allows the state to share information with schools about students who qualify for free and reduced-price meals because they participate in Medicaid and live in households with incomes under 185% or 130% of the Federal Poverty Level. This project has been very successful at identifying additional students who qualify for free and reduced-price meals. As a result, many Provision 2 and pricing schools have seen an increase in their free and reduced percentages in school year 23–24.

Rhode Island

Historically, Rhode Island determined a student's low-income status based on their eligibility for FRL programs. This method relied on household income applications submitted by families, which were then processed by schools to assess eligibility.

Michigan

The Economic Disadvantage Indicator in Michigan includes categorical eligibility and identifies students participating in assistance programs such as SNAP, TANF, and Medicaid. Additional Factors: Considers students experiencing houselessness, those in foster care, and other indicators of economic hardship.

Has this method changed in the last 10 years?

Colorado

The previous approach was to identify students as at risk through one of the following: (1) Direct Certification List—SNAP, TANF, or migrant students; (2) Applications for Free and Reduced-Price School Meals; (3) Family Economic Data Survey forms; (4) Categorical eligibility determination lists (such as district-created migrant, houselessness, Head Start, runaway, and or foster child lists).

Oregon

Nothing available.

Massachusetts

Individual school districts have used the so-called "Direct Certification" process to access enrollment data from these programs for many years, in order to validate their free and reduced-price school lunch participation.

Vermont

In school year 22-23, there was little incentive for households to return free and reduced meal applications as meals had been served at no charge for several years. As a result of these

changes, free and reduced percentages may not be an equivalent metric of student poverty when compared year-to-year for the past several years.

Rhode Island

Over the last 10 years, the introduction of CEP has significantly impacted the identification process. CEP allows schools with high percentages of low-income students to offer free meals to all students without collecting individual household applications. While this reduces administrative burdens and stigma, it complicates the collection of individual income data traditionally used to identify low-income students.

Michigan

Over the last 10 years, Michigan has shifted from relying solely on FRL applications to the more comprehensive Economic Disadvantage Indicator. This change was driven by the need to address limitations in FRL data, especially with the introduction of CEP.

Has CEP impacted FRL data collection in the state?

Colorado

Colorado in 2022 defined at-risk students as those eligible for FRL and allocates additional dollars for their education. Adoption of universal free meal programs (e.g., CEP weakens this measure as an accurate count of low-income students. Families are less likely to return income forms when their students already receive free meals. Districts may have concerns about transitioning to CEP and at-risk status.

Oregon

Nothing available.

Massachusetts

In 2022 USDA introduced the CEP as an option for schools and districts with high concentrations of low-income students. Under CEP, all students in the participating schools are entitled to receive free meals under the school nutrition program. This eliminates the cost and administrative burden of collecting and processing family applications, as well as the costs associated with collecting lunch fees. More importantly, CEP increases student participation in school nutrition programs, and we know that students learn better when they are not hungry. For all these reasons, the Department of Elementary and Secondary Education (DESE) is encouraging eligible schools and districts to participate in CEP.

Vermont

Act 64, Vermont's permanent universal meals law, requires that public schools offer meals and provides state funding if they do so through the CEP or Provision 2. Act 64 also provides state funding for meals served to public school students at state-approved independent schools if those schools choose to offer universal meals through CEP or Provision 2. State funding will cover the difference between the "paid" and "free" reimbursement rates for meals in the "paid" category.

Rhode Island

Beginning with the FY 2024 calculation, students whose family income is at or below 185% of federal poverty guidelines will be determined by participation in SNAP. The number of students directly certified through the RI Department of Human Services shall be multiplied by a factor of 1.6. The implementation of CEP has led to a decline in the collection of individual FRL applications, as schools no longer need to gather this information to provide free meals. This shift has resulted in challenges for programs and funding mechanisms that previously relied on FRL data to identify and support low-income students.

Michigan

The implementation of CEP, which allows schools with high percentages of low-income students to offer free meals to all students without collecting individual household applications, has reduced the collection of FRL applications. This shift has presented challenges for programs and funding mechanisms that previously relied on FRL data to identify and support low-income students.

Did the state do anything to replace or supplement the FRL data collection to better capture the status of low-income students?

Colorado

Yes. A new at-risk measure is: Identified Student Percentage (ISP) + neighborhood SES. ISP = Directly Certified Students (TANF, SNAP, migrant education program) + Categorically Eligible Students (houseless, Head Start, migrant, in foster care).

Oregon

Potential Alternatives:

- Keep definition as students eligible for free/reduced price meals but change data source to use Direct Certification data
- Use direct certification data and expand categorical eligibility to include other student groups such as migrant students, students experiencing houselessness, highly mobile students
- Student group status: Migrant students, foster care
- Family/household income
- Resident parent/guardian information: Highest level of education; occupation

Massachusetts

The state’s economically disadvantaged metric, called so to differentiate it from the old "low income" measure, will be used to report data from all schools and districts, not just those participating in CEP. The new measure will be based on a student's participation in one or more of the following state-administered programs: SNAP; the Transitional Assistance for Families

with Dependent Children; the Department of Children and Families' (DCF) foster care program; and MassHealth (Medicaid).

Vermont

In October 2022, average daily participation (ADP) was 50,864 for lunch and 32,452 for breakfast—an increase from September, when ADP was 49,456 for lunch and 29,759 for breakfast. In percentage terms, lunch ADP for October 2022 was 60.55%, and breakfast ADP was 38.63% which were lower than the "average participation" scenario evaluated by the Joint Fiscal Office in the fiscal note for S. 100 published in March 2021. These participation rates represent an increase over October 2019, when ADP was 50.47% for lunch and 28.56% for breakfast. Statewide, 34.85% of students qualified for free and reduced-price price meals in October 2022, compared to 38.23% in fall 2019. This average included schools operating CEP. CEP schools do not collect applications and rely on their direct certification rate multiplied by 1.6 to arrive at a free and reduced-price percentage. As of October 1, 2022, at schools operating Provision 2 in their base year, approximately 3,450 households qualified for free or reduced-price meals based on applications submitted this school year.

Rhode Island

To address the data gap created by CEP, Rhode Island has considered alternative measures such as Direct Certification. This method identifies students eligible for free meals through their participation in programs like SNAP and TANF. While effective, it may not capture all low-income students, especially those not enrolled in these programs.

Michigan

To address the data gap created by CEP, Michigan has adopted the Economic Disadvantage Indicator, which supplements direct certification data with additional socioeconomic factors. This approach aims to provide a more comprehensive measure of student poverty.

If so, has it been evaluated to show that it is comparable to or more accurate than FRL under CEP? What were the evaluation results?

Colorado

The working group's decision was to also add Medicaid to the ISP portion of the equation, because the estimates using the new approach were low in some areas. After the working group made their recommendations, the new approach was evaluated through a pilot project.

Oregon

Nothing available.

Massachusetts

Because of this change in methodology, the number of economically-disadvantaged students reported as enrolled on October 1, 2014, in most schools was expected to be lower than the number of low-income students reported in 2013–14 and prior years. Obviously, this has nothing

to do with any real changes in family income; it is simply a shift from one valid measure to another valid measure. Neither measure is "right" or "wrong" (in fact, neither measure lines up exactly with the Census Bureau's "poverty" definition), but either can be a useful surrogate in identifying how well the state is serving children at the lower end of the socioeconomic scale. It is important for users of this data to understand that enrollment percentages and achievement data for economically disadvantaged students cannot be directly compared to low-income data from prior years.

Vermont

Nothing available.

Rhode Island

The effectiveness of these alternative measures has been a subject of evaluation.

Comparability to FRL Data: Studies have shown that while direct certification is accurate for identifying students in public assistance programs, it may undercount low-income students not participating in these programs. The Economic Disadvantage Indicator offers a more comprehensive measure but requires robust data integration and management.

Accuracy Under CEP: The Economic Disadvantage Indicator has been found to be more accurate than FRL data under CEP, as it does not rely solely on meal applications and includes multiple indicators of poverty.

Michigan

Studies have indicated that while direct certification is effective for identifying students in public assistance programs, it may undercount low-income students not participating in these programs. The Economic Disadvantage Indicator offers a more comprehensive measure but requires robust data integration and management.

What was the implementation of this change like?

Colorado

Data abnormalities—some districts saw increases in the number of at-risk students identified through the new measure, yet others saw surprising decreases. While implementation would likely not be a significant challenge for non-rural districts, implementation of the new at-risk measure would likely be extremely burdensome and challenging for rural and small districts.

Oregon

Nothing available.

Massachusetts

Department of Elementary and Secondary Education uses the same direct certification process on a statewide basis. Strict data security protocols are in place at the Executive Office of Health and Human Services to ensure that all confidential data is protected in accordance with federal and state data privacy statutes and security policies.

Vermont

Under the Medicaid Direct Certification Pilot, Vermont will be able to directly certify children in Medicaid with incomes up to 130% of the Federal Poverty Level (FPL) for free meals, and children in Medicaid with incomes up to 185% of FPL for reduced-price meals. The Department of Vermont Health Access estimated (at the time this report was written) they would have about 33,000–37,000 children ages 5-18 in one of those two categories in September of 2023. Even if this included every student already directly certified and eligible via application for free and reduced-price meals (which seems reasonable given Vermont's high Medicaid uptake), this number would be higher than the number of students qualified for free and reduced-price meals in fall 2022 (after universal meals started). This number is even slightly higher than the total number of students who qualified for free and reduced-price meals by any means in 2019 (when schools were still charging for meals). If these preliminary estimates hold true, Medicaid Direct Certification could eliminate the problem of households not returning applications because meals are free. This is very positive for both the cost of universal school meals, and the impact of universal school meals on the state's metrics of student poverty.

Rhode Island

Data Integration: Schools and districts have had to integrate data from various sources, necessitating updates to data management systems and staff training.
Stakeholder Engagement: Educators, administrators, and policymakers have been involved in discussions to understand the implications of the new measures and to ensure accurate identification of low income students.
Impact on Funding and Programs: Accurate identification is crucial for allocating resources and funding. The new measures aim to ensure that programs targeting low-income students continue to receive appropriate support.

Michigan

No information.

Who was impacted by the change?

Colorado

Rural schools seem to be undercounted by the new measure.

Oregon

Nothing available.

Massachusetts

The foundation budget, which is used to calculate both Chapter 70 school aid and charter school tuition rates, currently relies on free and reduced-price data. For grant programs that require poverty data for eligibility or entitlement calculations, the appropriate DESE program office will provide guidance directly to districts and schools. School building authority reimbursement rates are also based in part on low-income percentages. The state provides information to the Massachusetts School Building Authority board and will assist them in

evaluating alternatives. Schools and districts that use free and reduced-price eligibility for sliding scale fees or other local purposes may continue to do so. For schools participating in CEP, this may involve a combination of direct certification data and some supplemental data collection from families.

Vermont

Staffing shortages caused reduced meal quality in some schools during fall 2022. School meals programs are subject to the same labor shortages among lower-paid workers as the rest of the economy. Data collected by the Agency of Education (AOE) shows the median pay for the lowest price school meals program workers during school year 2021–22 was $15/hour, and school meals programs have reported significant difficulties in hiring and retaining staff. As COVID-19 and other respiratory diseases circulated, schools saw lower overall attendance rates as students stayed home sick.

At the time this report was written, AOE did not yet have attendance data for fall 2022, but based on anecdotal reports, it seems likely that overall reduced attendance due to illness could have had an impact on average daily participation. Several school meals programs reported that universal meals allowed them to reduce or completely eliminate a la carte offerings in the cafeteria, which they previously needed to sell to support their program operations. The nutritional quality of a la carte items is subject to some federal regulation but is generally lower than the full reimbursable meal.

Rhode Island

Low-income students and families benefited from reduced stigma and continued access to resources, though some at-risk students might have been overlooked initially if not covered by public assistance. Schools and districts faced adjustments in data collection and reporting processes, impacting their funding based on the new metrics. Educators and staff had to adapt to new metrics that affect resource allocation and require additional training and familiarization. State and district administrators were responsible for managing new data systems and ensuring compliance, as well as evaluating the effectiveness of the new metrics compared to the previous method. Policymakers adjusted funding formulas to align with new poverty indicators, ensuring fair distribution of resources to high-need schools. Community stakeholders and advocates monitored the transition to ensure it continued to support low-income families equitably.

Michigan

Students and families benefited from reduced paperwork with CEP and more accurate identification of low-income students. Schools and districts had to adjust data management systems and processes, which influenced funding allocation. Educators and support staff gained a clearer picture of student needs to inform support services and resource planning. Policymakers and state officials used the ED Indicator to shape funding formulas and policies focused on equity. Community organizations relied on the comprehensive data to better tailor their programs for low-income students.

Any overall insights about transition to a different approach to capture low-income status?

Colorado

The working group recommended a policy such that district funding could not drop below 2022–2023 levels, to ensure that there would be no harm to districts. From the pilot project, challenges fell into two general categories, those concerning the calculation required for the new measure and those concerning administrative burden that may be caused by the new measure. Calculation concerns involve both logistical issues regarding components of the new measure that have not been finalized as well as modeling issues that have demonstrated that in its current format, the new at-risk measure could have a devastating impact on funding for some districts. Administrative concerns involved the fact that compiling the necessary data will be a heavy lift for smaller districts and the new measure does not eliminate the need for districts to distribute and collect FRL applications.

Oregon

The Oregon Poverty Measure adjusts the poverty threshold for geographical differences in housing costs and shows that poverty in Oregon is concentrated in rural southern Oregon along with a few pockets of large metro areas, including north Salem, and northeast and east Portland. The ORPM takes into account social safety net programs and shows that these programs help lift people out of poverty. Fewer children (<18) are identified as "low income" through the ORPM poverty measure—this could have an impact on their access to resources such as FRL.

Massachusetts

For anyone who used free and reduced price eligibility data for a multitude of purposes over the years, the shift to a new metric will not be easy. Nevertheless, it is a necessary change so that less affluent cities and towns can take advantage of the many benefits of the USDA's CEP.

Vermont

As of January 2023, AOE did not expect the school year 22–23 costs to exceed this appropriation, but the state continued to monitor this very carefully. One way to estimate costs for the current year is to take October 2022 ADP and multiply it by the state-wide “paid” percentage of 65.15%. If free, reduced, and paid eligible children eat in equal proportion to their status, and participation did not increase beyond October 2022 ADP, the state planned to pay out $27,156,850 for universal meals in school year 22–23. If participation increased substantially after October, or paid-status students eat at significantly higher percentages than free and reduced-price eligible students, then these costs would grow and additional funds could be needed. At the time of this report, it did not seem likely that paid eligible students would participate at higher rates than free and reduced-price eligible students. However, it was/is certainly possible that participation will increase beyond October ADP.

Three factors influence the amount of state funding needed for universal meals. The first is participation. The second is the number of households who qualify for free and reduced-price

meals by submitting applications at Provision 2 schools. Both of these factors have already been discussed earlier in the report. The third factor impacting cost is the difference between the federal paid and free reimbursement rates, which are updated annually in July. Act 151 ties state funding for universal meals to the difference in these rates. Potential changes to these rates were not accounted for in prior cost estimates, and should be considered going forward.

Rhode Island

Comprehensive Data Collection: Relying on multiple indicators provides a more accurate picture of student poverty, especially in the context of CEP.
Challenges in Data Management: Integrating various data sources requires significant effort and resources but is essential for accurate identification.
Policy Implications: Policymakers need to consider the limitations of traditional measures and support the development of more comprehensive indicators to address the needs of low income students effectively.

Michigan

No information.

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Appendix E: Assessment of Promising Alternative Metrics

Table 7 showcases the assessment of promising alternative metrics for Washington state use cases, with rationale.

Table 7. Comparison of Promising Low-income Measures (details)

Use Case	SAIPE	Categorical Eligibility only	Categorical Eligibility + form	Neighborhood SES (nSES)
Washington State Report Card			Is consistent with what is currently being used and how most states report low-income school and student performance (which supports data comparisons).	
ERDC Reporting			Is consistent with what is currently being used and how most states report low-income school and student performance (which supports data comparisons).	
Child Nutrition Programs			This approach is the preferred one for capturing individual students.	
CBS Program			This approach is the preferred one for capturing individual students. Consider expanding	

Use Case	SAIPE	Categorical Eligibility only	Categorical Eligibility + form	Neighborhood SES (nSES)
			categorical eligibility	
House Bill 1660			This approach is the preferred one for capturing individual students. Consider expanding categorical eligibility	
Teaching Bonus*		A feasible and simple way of identifying which schools are low-income, without reliance on family income forms and not influenced by USDA programs and policies.		Comprehensive and nuanced measure of economic disadvantage aligns with the purpose of the bonus—to support teachers in schools with concentrated poverty, ensuring resources reach teachers working in the most challenging educational settings.
WSIF		A feasible and simple way of identifying which schools are low-income, without reliance on family income forms and not influenced by USDA programs and policies.		Comprehensive and nuanced measure of economic disadvantage that captures school-level differences.

Use Case	SAIPE	Categorical Eligibility only	Categorical Eligibility + form	Neighborhood SES (nSES)
Activity Grants		A feasible and simple way of identifying which schools are low-income, without reliance on family income forms and not influenced by USDA programs and policies.		Comprehensive and nuanced measure of economic disadvantage that captures school-level differences.
RAD Schools		A feasible and simple way of identifying which schools are low-income, without reliance on family income forms and not influenced by USDA programs and policies.		Comprehensive and nuanced measure of economic disadvantage that captures school-level differences.
SNAP-Ed Program		Uses readily available information to identify schools and students.	Is in alignment with how low-income students are identified through the Child Nutrition Programs.	Provides a nuanced way to identify how needs vary between schools.
Federal Technology Funding	Provides reliable income data at the district level. Readily available. WA State uses this data for Title 1 funding decisions.			

Use Case	SAIPE	Categorical Eligibility only	Categorical Eligibility + form	Neighborhood SES (nSES)
Title 1 Funding	WA State uses this data for Title 1 funding decisions. To direct funding between schools the FRL metric is used.			Provides income data at the school level to support LEA decision making for Title 1 funding.
Learning Assistance Program	Provides reliable income data at the district level. Readily available.			Provides income data at the school level to support LAP high-poverty program decision making.

Legend: Most promising measure, Second most promising measure (optional)

CBS: College Bound Scholarship Program
*Bonus for teachers working in high-poverty areas
WSIF: Washington School Improvement Framework
RAD: Required Action District

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