



## **Follow-Up Testimony for the Task Force on the Implementation of the Pupil Weighting Factors Report**

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Thank you for the opportunity to provide testimony to the Task Force on the Implementation of the Pupil Weighting Factors Report. I am writing to further develop several points we did not have time to fully explore during the hearing on July 29th, 2021.

I made two main points at that hearing:

1. The way we determine which students are “low income” right now significantly undercounts the true number of economically disadvantaged students.
2. The Alternative Household Income Form is a flexible and powerful tool that can collect key data needed to both identify high-needs students for purposes of pupil weighting, and maximize Vermont’s ability to draw down Title I and other critical federal education supports.

### **Further Elaboration of Point 1: Enrollment in 3SquaresVT and/or a school’s free meals program significantly undercounts the true number of economically disadvantaged students**

- The default way to count “low income”/economically disadvantaged students for federal education programs (like Title I) has been to use those students enrolled in a school’s free and reduced-price meal program as a proxy, either because their parent or guardian filled out a school meal application and was determined to qualify, or because they or their household were enrolled in another qualifying program (3SquaresVT, Reach-Up, Headstart, homeless, migrant), and were automatically enrolled by their school district.
- The proxy that has been used to count the number of low income students for Vermont’s pupil weighting has been a student’s household’s enrollment in 3SquaresVT.
- Both of these approaches inevitably and always undercount the number of low income students attending any given school, because these approaches measure access and use of specific federal programs, rather than eligibility for those programs. Many households that are eligible for free school meals do not complete

the applications to enroll their children. Even more eligible households do not choose to apply for 3SquaresVT.

- This means that using school meal applications to count the number of “low income” students for Title I funding and other similar purposes leaves federal education dollars--and federal school meal program dollars--in DC that should be flowing to Vermont schools.
- Eligibility for 3SquaresVT and school meals also undercounts the true number of students who experience the harmful consequences of living in households that have inadequate income because the cut-off to qualify for either 3SquaresVT or free school meals in Vermont is 185% of the Federal Poverty Level (FPL), or \$49,025 annually for a family of 4. \$49,025 falls well below the \$57,814 Vermont’s JFO calculates is required to fund the annual Basic Needs Budget for a family of 4 in our state.
- Many children, for example, live in food insecure households that are over-income for 3SquaresVT and free school meals--the Urban Institute estimated in a 2019 study that up to 42% of all food insecure children in Vermont could be living in such households (see the study submitted to accompany this testimony).
- Even the JFO Basic Needs budget fails to cover the full amount needed to ensure families in Vermont are food secure (see the “Budget of a Food Insecure Family” handout submitted to accompany this testimony).
- The number of families with children who will not be able to meet their basic needs, and who therefore will experience the mental and emotional stress, health challenges, school readiness and attendance challenges, and other consequences of being low income, is likely to continue to grow, given the current severe shortage of affordable housing, combined with rapidly rising food and housing costs in Vermont, and the continuation of the COVID-19 pandemic.
- **The income cut-off for designating a student’s household as “low income” in Vermont is a policy decision, and a funding decision, that the legislature must make, guided by this Task Force’s recommendations. I urge you to recommend a household income measure that is better related to the actual cost of meeting basic needs in Vermont than the standard income measures currently in use.**

**Further Elaboration of Point 2: The Alternative Household Income Form is a flexible and powerful tool for collecting the kind of data the State of Vermont may need to determine pupil weighting**

- With the advent of the Community Eligibility Provision (CEP) in 2012, and the subsequent dramatic expansion of universal school meal programs, many more schools have no longer been collecting school meal applications. This was the case for over 25% of Vermont’s public schools in 2019.
- The U.S. Department of Education created the Alternative Household Income Form option to address the need for school districts to continue to collect income

information in order to draw down Title I and other federal education funding tied to the number of “low income” students attending specific schools.

- When school districts use best practices to distribute and collect Alternative Household Income Forms, the result is a more accurate count of all “low income” students. This is because while school districts are legally prohibited from requiring all families to fill out school meal program applications, they are permitted to require that every family fill out and submit an Alternative Household Income Form. (Note that the State of Vermont may not require school districts to require this form.)
- **This Task Force has a tremendous opportunity to solve multiple problems with one form, because the U.S. Department of Education permits states considerable flexibility in the design of these forms. (Examples from several states, including Vermont, were provided to accompany this testimony.)**
- It is important that any form designed by the State of Vermont uses every available best practice for content and design, so that it collects all needed information in the simplest, least intrusive way possible, while still complying with federal requirements.

**A Final Point: Both individual and universal interventions are powerful tools for ensuring that all students learn and thrive**

- The symptoms of economic and social disadvantage among students are well documented, and include:
  - Lower test scores in reading and math
  - Inability to focus in class
  - Higher rates of tardiness and absenteeism
  - Increased visits to the school nurse and greater health challenges
  - Higher rates of disruptive behavior and behavioral referrals
  - Lower rates of graduation
  - Higher rates of grade repetition
- As this Task Force has learned, it is not easy to choose an income cut-off that will guarantee that all students displaying these symptoms of economic and social disadvantage are properly weighted. It is even more difficult to ensure that all students who need additional supports will receive them equitably in every school district.
- While individualized interventions are essential, universal interventions that do not depend upon identifying specific disadvantaged students can eliminate the stigma associated with such identification, while improving outcomes for all students, including those who would not be “weighted” under any methodology this Task Force may recommend.
- Universal school meals is one such universal intervention that has been documented to effectively mitigate every symptom listed above--with the greatest improvements

often documented for students who are over-income to receive free or reduced-price school meals (having household income above 185% FPL).

- Getting the state's Alternative Household Income Form right, and urging all school districts to require it, will remove the greatest single impediment to the statewide provision of universal school meals -- which would ease the financial burden on all families more equitably, and remove one significant cause of low income student, and ELL student, underperformance -- being hungry and malnourished at school.
- **Combining a more accurate count of all economically disadvantaged students, as this Task Force is working to do, with providing school breakfast and lunch at no charge to all students, will contribute to the equitable education outcomes we are all striving to achieve in all VT school districts.**