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To: Members of the Task Force on Implementation of Pupil Weighting Factors Report

From: Anore Horton, Executive Director, Hunger Free Vermont

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Subject: Recommendations for language changes to the draft Report of the Task Force regarding measurement of poverty (pages 4 and 10 of the draft report)

Recommendation to add deadlines by when the Universal Income Declaration form will be developed and implemented for all school districts (pages 4 and 22-23 of the draft report)

Recommendations for language changes to the draft Report of the Task Force regarding measurement of poverty (pages 4 and 10 of the draft report)

Hunger Free Vermont applauds the recommendations of the Task Force on Implementation of Pupil Weighting Factors Report related to the measure of poverty to be used to count low income students (pages 4 and 10 of the draft report). The Task Force members accurately understand that the current use of students enrolled in, or living in households enrolled in, 3SquaresVT (SNAP) significantly undercounts the students who are meant by current state law to be reached with school funding allocations intended to provide additional educational supports for students living in poverty.

Hunger Free Vermont agrees with the Task Force members' assessment that using enrollment in the federal free and reduced-price school lunch program (FRL) is a better measure to use to count students in poverty compared to enrollment in SNAP. While FRL still, as the Task Force's draft report acknowledges, undercounts low income students, the undercount is less than it is when 3SquaresVT (SNAP) data is used.

Hunger Free Vermont respectfully recommends several key language changes to the draft report that we believe would more accurately reflect the intent of the Task Force in regard to this important recommendation. At issue is the difference between "eligibility for" and "enrollment in" in SNAP and FRL.

The income eligibility cut-off for 3SquaresVT (SNAP) and FRL is identical in Vermont: 185% of the Federal Poverty Level. Thus, the income measure of "students living in poverty" proposed by the Task Force (for now) is 185% of the Federal Poverty Level (the same as it is in current law), and the draft report is recommending a change in how students living in households with incomes at or below 185% of the Federal Poverty Level ought to be identified so they can be accurately counted by school districts and the state.

Enrollment in 3SquaresVT (SNAP) has been the measure used for this purpose, and it undercounts the actual number of students living in poverty because, as the draft report accurately states, many households that are eligible (have incomes at or below 185% of the Federal Poverty Level) do not apply for 3SquaresVT (SNAP), and therefore are not enrolled to be counted.

The difference between eligibility and enrollment is the same for FRL, but again, as the draft report accurately states, income-eligible households are more likely to apply for FRL than they are to apply for 3SquaresVT (SNAP), and therefore a higher number of low income students are enrolled in FRL at any given time to be counted than are enrolled in 3SquaresVT (SNAP).

To ensure that the intentions of the Task Force are accurately represented in the final report, Hunger Free Vermont recommends these changes to the draft report language:

Counting Students in Poverty (Page 4 of the draft report dated December 7, 2021*)

Change the measurement used for determining a student living in poverty for the purposes of determining school funding allocation from ~~eligibility for~~ **enrollment in** the Supplemental Nutrition Assistance Program (SNAP) to ~~eligibility for~~ **enrollment in** the federal free and reduced-price lunch (FRL) program and eventually moving to a poverty measurement ~~based on~~ **determined by the legislature, but not lower than 185% of the 2021 Federal Poverty Level, with data to be collected using** a universal income declaration form.

*The same language changes would need to be made to the description of this recommendation on page 10 of the draft report dated December 7, 2021.

Making these proposed revisions to the language of the recommendation for how to count students in poverty (on pages 4 and 10 of the draft report) would make the language of the recommendations consistent with the language on page 22 of the draft report (**VII. Measurement of Poverty**), where SNAP “enrollment” is accurately named as the current measure of students living in poverty, and “*FRL enrollment*” is accurately named as the “*interim step*” the Task Force is recommending be taken to more accurately measure poverty.

Recommendation to add deadlines by when the Universal Income Declaration form will be developed and implemented for all school districts (pages 4 and 22-23 of the draft report)

Hunger Free Vermont strongly supports the Task Force’s recommendation of “*moving to a Universal Income Declaration form for all school districts.*” (page 22)

Using a Universal Income Declaration form that all student households would complete would almost, if not entirely, eliminate the gap between eligibility of a student to be counted among those who should be receiving additional educational supports, and their enrollment in any particular means-tested federal program.

The adoption of a Universal Income Declaration form used by all school districts has the added benefit of being easily revised based on the results of the regular evaluations recommended by the Task Force (pages 15-16). Should a future evaluation conclude that a different measurement of poverty (for example, Medicaid enrollment, or a household income level higher than 185% of the Federal Poverty Level) would more accurately identify students in need of additional educational supports, this form, if well-designed, could be readily adapted to collect different information from households as needed.

Hunger Free Vermont also supports the recommendation of the Task Force that “AOE convene a working group, including school staff and hunger and nutrition experts, to draft a new form that is fully accessible to families before statewide implementation.” (page 23)

We do, however, strongly urge the Task Force to recommend specific deadlines for both the development and the statewide implementation of a Universal Income Declaration form.

While we recognize that AOE and school districts are experiencing many challenges with limited capacity, we also know that the number of schools providing universal school meals (and therefore needing to implement such a form because they are no longer collecting FRL applications) is growing rapidly in Vermont. Should pending federal and state legislation pass as expected in 2022, all schools in Vermont could be providing universal school meals and no longer collecting FRL applications by 2023. This reality makes the development of an alternative form extremely urgent.