ESEA (Title I) Poverty Data
FY23 Data Collection for FY24 Grant Funding
Updated 04/18/22

Title I LEA Level Allocations

While SAIPE (Small Area Income and Poverty Estimates) Census data is the main factor driving Title I eligibility, the calculation also uses the income eligibility guidelines to determine an LEA's portion of that census data. This information is collected both through *CNP Web with Free and Reduced Lunch (FRL) data* as well as through *AzEDS as Income Eligibility indicator 1 and indicator 2*. From these two sources, the highest calculated poverty rate is chosen for each LEA. With the transition back to the National School Lunch Program (NSLP) from the Seamless Summer Option (SSO), it is important to know which forms to use.

When to use Free and Reduced Lunch Forms?
Free and Reduced lunch forms can be used to collect poverty data for Title I and other Federal programs when used in conjunction with Child Nutrition Programs. Use FRL forms at sites operating under the regular National School Lunch Program (NSLP). Students at a regular NSPL site can only qualify for free and reduced lunches using FRL forms and not income eligibility forms.

When to use Income Eligibility Forms?
Use Income Eligibility forms if your sites do not operate a Child Nutrition Program (CNP). Also use for sites operating under the Community Eligibility Provision (CEP) or Special Provisions Options 2/3 (non-base year) to collect student level data for Accountability and other programs.

Title I LEA level Allocation calculation uses the best of these 2 data sources looking at LEAs as a whole:

AzEDS Poverty Percentage: student-level
- Income Eligibility (entered as Indicator 1 or Indicator 2)
- Free Lunch (entered as Indicator 1)
- Reduced Lunch (entered as Indicator 2)
- Direct Certification (entered as Indicator 1)

Must have document to support the indicators. Do not automatically mark all CEP. No rollover from previous year by Oct 1st data deadline.

HNS (Health and Nutrition Service) Title I Free and Reduced Lunch Percentage: aggregated
- Report provided by HNS based on October meal claim data provided by LEAs
- Includes CEP percentages and SPO (Special Provisions Options) 2/3 percentages, not 100%

Report pulled specific for Title I calculations, filters for ages 5-17 and uses 1.6 multiplier for CEP.

Equity for all students to achieve their full potential

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AzEDS Data Collection

STEP 1: Free and Reduced Lunch Forms
Enter Free eligibility as indicator 1 and enter Reduced eligibility as indicator 2

Even though students may be marked as Free or Reduced within the Student Information System (SIS), they must also be marked with an Income Eligibility indicator (1 or 2) for that poverty information to be sent to AzEDS. You may need to check with your SIS vendor on your system setup to ensure these steps are happening correctly.

STEP2: ESEA (Title I) Income Eligibility Forms
Enter as indicator 1 or indicator 2 as selected on form

The LEA may choose to send home Income Eligibility forms *(English)*/ Income Eligibility form *(Spanish)* as an alternative method to collecting poverty data. In the SIS, students are marked as either indicator 1 (free) or indicator 2 (reduced). Electronic signatures can be utilized for income eligibility. See FAQ for more information.

Please remember that if Income Eligibility forms are collected, the cost of the alternate income application disbursal, collection and processing *cannot* be paid from the nonprofit school food service account.

STEP 3: Direct Certification
Enter as indicator 1

Direct Certification, accessible through ADE Connect, matches students who are eligible through SNAP, TANF, Foster Care, Homeless, Food Distribution Program on Indian Reservations and MEPS/Medicare/Medicaid, without families having to submit a form.
If a school chooses to use a combination of Direct Certification and the Income Eligibility Forms, it is important to send the Income Eligibility form to all students so as not to overtly identify students in poverty.

Key Points
- LEA level allocations are based on the LEA/District's overall poverty percentage; therefore, it is important to collect poverty data for all your sites, even though some sites may not qualify for site level allocations.
- Check your data in AzEDS by running the Oct 1 Enrollment Report: filter for Oct 1 status and ages 5-17 to get enrollment count. Poverty count is those students who have indicator 1 or indicator 2. View micro-training video here.
- Data must be entered and validated prior to the deadline. While corrections can still be made to your AzEDS data after the deadline, the Oct 1st Title I Eligibility count will be locked.

As this data is reported at the federal level as well as the local level and used for multiple allocations and other state and federal activities (e.g., Accountability subgroup improvement calculations) it is important to supply as much student level poverty data as possible each school year. Providing services to students and supporting schools is our top priority.

FAQs

What is the difference between Free and Reduced Lunch forms and Income Eligibility forms?
Free and Reduced lunch forms can be used to collect poverty data for Title I and other Federal programs when used in conjunction with Child Nutrition Programs. However, The United States Department of Agriculture (USDA) has previously released guidance that LEAs are prohibited from distributing and processing FRL applications *solely* to obtain household income information in order to determine the funding or benefits for programs other than the Child Nutrition Programs *(HNS#17-2021)*. Therefore, Income Eligibility forms provide an alternative method of collecting the same data. **Note: Free and Reduced Lunch is contingent on FRL forms (not income eligibility forms) for regular NSLP sites.**

Can Income Eligibility forms be used with online registration?
Yes, schools may utilize digital versions of the form to collect information remotely. However, the same data as on the form must be collected and records retention policies apply.

Can electronic signatures be utilized?
Yes, a digital signature collected through platforms such as Google Forms or Microsoft Forms can be used to collect Income Eligibility. This resource from USDA, that describes criteria for electronic signature for SNAP, can also be applied to the Income Eligibility forms. Arizona does allow for electronic signatures through ARS §18-106(C): "An electronic signature shall be unique to the person using it, shall be capable of reliable verification and shall be linked to a record in a manner so that if the record is changed the electronic signature is invalidated."

An example would be to build a Google Form with the Income Eligibility fillable Pdf as an attachment. The digital signature can be a typed name on the application, or a mouse click of an "I Agree" button on the Google Form. As the Google Forms are submitted, collect the submission email address and time stamp.

Can we continue to collect Income Eligibility data past Oct 1?
Yes, the Oct 1st Title I Eligibility Count includes students who are enrolled on October 1, but LEAs can continue to add indicator 1 and indicator 2 to those student's records through the January 15th deadline.

Can Title I enrollment and eligibility data be corrected in AzEDS after January 15th?
No, Data must be entered and validated prior to the deadline. While corrections can still be made to your AzEDS data after the deadline, the Oct 1st Title I Eligibility count will be locked.

What enrollment data is used for site level allocations (rank and serve)?
LEAs must use a consistent methodology. LEAs can use their AzEDS Oct 1st enrollment (preferred) or their 40th or 100th day ADM. Enrollment should be filtered for K-12.

What Federal regulation outlines poverty data options for site level allocations (rank and serve)?
To determine the number of public school students from low-income families, section 1113(a)(5)(A) of the ESEA provides an LEA the option to use the number of public school children:

➢ Eligible for free or reduced-priced lunch (FRPL) under the Richard B. Russell National School Lunch Act (including children counted through the Community Eligibility Provision);

➢ Data from a poverty survey conducted by the LEA to replicate data usually collected under Richard B. Russell National School Lunch Act (Income Eligibility)

➢ In families receiving assistance under the State program funded under Title IV, Part A of the Social Security Act (Temporary Assistance for Needy Families);

➢ Eligible to receive medical assistance under the Medicaid program;

➢ Ages 5-17 in poverty as counted in the most recent LEA-level census poverty data approved by the Department; or
Note: Because census data are generally not available at the school level, if an LEA uses this measure, it would most likely be part of a composite with one or more of the above measures

➢ Counted by the LEA using a composite of any of the above measures.

What poverty data sources are available for site level allocations (rank and serve)?
AzEDS Poverty Percentage
- Oct 1 AzEDS Enrollment Report, filtered K-12
- Report provides both the enrollment and poverty % needed for Rank and Serve
- Finalized on January 15th

HNS Free and Reduced Lunch Percentage
- Published Report https://www.azed.gov/hns/frp
- Based on October claims
- Includes CEP using 1.6 multiplier
- Do not use the HNS enrollment

If you have specific questions regarding the collection of income eligibility data, please contact Aaron Tyler by email at Aaron.Tyler@azed.gov.