

Guidance on Determining Economically Disadvantaged Status for Title I and School Accountability

March 2024

Economically disadvantaged status

An Alaska student is identified as “economically disadvantaged” if the student meets the eligibility requirements to qualify for free or reduced-price school meals under the department's Alaska Income Eligibility Guidelines for Free and Reduced Meals program, adopted by reference in 4 AAC 06.899(5). All economically disadvantaged students must be identified as such in all OASIS data collections.

Purposes

Schools and districts must determine which students are considered economically disadvantaged for several purposes:

- Determining students who are members of the economically disadvantaged subgroup for school and district accountability as required by Alaska regulations 4 AAC 06.830 and 06.899(5).
- Determining which students are eligible for free or reduced-price meals, if the school offers a school meal program.
- Determining a school’s percentage of economically disadvantaged (or “low-income”) students for identifying schools eligible for Title I, Part A funding and services.
- Determining a school’s eligibility for funding under the federal E-Rate program that supports school internet access.

Sources of data

Districts use family income and/or categorical eligibility data to determine if a student is considered “economically disadvantaged” for all of the above purposes. These data come from one or more sources:

1. **Household applications** for school meal programs like the National School Lunch Program (NSLP) and School Breakfast Program (SBP) are completed by families to verify their income level to determine if their students qualify for free or reduced-price meals in schools that offer school meal programs. These are never completed in a Community Eligibility Provision (CEP) school. Provision 2 and Provision 3 schools only collect applications during a base year and, dependent on economic conditions, may never be required to collect applications in subsequent years.
2. **Categorical eligibility** for free meal applies to students who are formally identified as migratory, runaway, homeless, in foster care (formally placed by court or through OCS), or Head Start. Categorical eligibility applies to an individual student and is not based on income status of the family.
3. **Direct certification** data identifies students who are eligible for free meals based upon household participation in assistance programs such as TANF (Temporary Assistance for Needy Families) or SNAP (Supplemental Nutrition Assistance Program/Food Stamps). DEED receives the list of students whose families participate in the Food Distribution Program on Indian Reservations (FDPIR) from the Alaska Native Tribal Health Corporation. These programs are income-based and all students in a household would qualify for free meals. The Department of Health and Social Services sends data monthly to DEED listing students directly certified and those in foster care. DEED adds FDPIR and migratory child data to this list and transmits the list of students to districts through the PrimeroEdge system.
4. **Income declaration forms** may be collected during annual school entry or enrollment for students *not already determined as eligible through one of the above methods*. This form is used in schools without school meal programs (including correspondence schools) and in CEP or Provision schools that do not collect household applications. The form may also be used in Provision 3 schools during years that household applications are not collected.

Frequently Asked Questions

1. What is a “Provision” School?

Schools with high poverty rates that operate school meal programs may qualify for one of the provision options.

- **Provision 2 or 3 schools** use income data from direct certification and household applications for a given year (called the base year) to determine the reimbursement percentage for school meals. No household applications are collected in years that are not base years. Depending on economic circumstances, schools may extend Provision 2 or 3 and will not be required to collect new applications; there is no limit to the number of extension that can be added this way.
- **Community Eligibility Provision (CEP) schools** never collect household applications. School eligibility is determined only by those children eligible through direct certification or specific category of eligibility for free meals. The school then receives an enhanced reimbursement rate by taking the rate of children categorically eligible times a multiplier provided by USDA. For school year 2023-2024 that multiplier is 1.6. This multiplier is an approximation for the number of additional students who would be eligible for reduced-price meals or free meals if household applications had been collected. The school can lock in the same school “free and reduced” meal rate for four years.

2. What is an Income Declaration Form?

All public schools that do not offer meal programs or that are not collecting household applications must use an Income Declaration form annually to determine which students are economically disadvantaged that have not already been identified through direct certification or categorical eligibility. The form collects general family income information. It is not an in-depth household application for school meal purposes but meets the requirements to determine economically disadvantaged status for Title I poverty rates, school accountability, and E-Rate. A sample Income Declaration form and instructions are posted on the DEED website at education.alaska.gov/ESEA/TitleI-A/. This form will be updated with the new income data after July 1 of each year, so be sure to use the current data for the applicable school year in which you are collecting the information. (Note: Household application forms for school meals may *not* be used for survey or other income collection purposes.)

3. How can we encourage families to turn in an Income Declaration form if a school does not offer a meal program or if the school is under the Community Eligibility Provision, Provision 2, or Provision 3?

The form is worded to encourage families to complete it because it brings benefits to the school such as E-Rate and Title I-A funding. Correspondence or charter schools that have an application process should collect the form as part of the application process. Other schools should include the form in the entry/enrollment packet for all students who are not already qualified through direct certification or categorical eligibility.

4. How is a household application for school meals different from an Income Declaration form?

A household application for free or reduced-price meals is a very detailed application that includes information about the family income. An Income Declaration form for Title I-A or E-Rate purposes is a simple form that allows the family to check the income range and number of people in the family and to list the children enrolled in schools in the district. The district then uses the income level chart to determine which families meet the criteria to be considered economically disadvantaged.

5. Are migratory children considered economically disadvantaged?

Migratory children are categorically eligible for free meals. *Only the migratory eligible children in the family qualify for free lunch; siblings that are not migratory eligible do not qualify.* Migratory children are eligible

for free meals and thus may be automatically considered as economically disadvantaged students for each school year in which they are migratory eligible students. For questions about identification of migratory children, contact DEED’s Migrant Education Program Manager, Sarah Emmal (Sarah.Emmal@alaska.gov), at (907) 465-3826.

6. Are homeless students or students in foster care considered economically disadvantaged?

Homeless students or students in court-appointed or State-placed (OCS) foster care are considered categorically eligible for free meals and thus may be automatically considered as economically disadvantaged students for the school year in which they are originally identified. For questions, contact Adrienne Schwartz (Adrienne.Schwartz@alaska.gov) at (907) 465-8721 for homeless students and Jessica Paris (Jessica.Paris@alaska.gov) at (907) 465-8716 for students in foster care.

7. Which district staff may have access to data on a child’s economically disadvantaged eligibility status?

The actual household application data for a school meal program is confidential. However, a student’s eligibility status as economically disadvantaged is required for federal education programs including Title I; therefore, the student eligibility status as economically disadvantaged must be available to applicable district staff for the purposes of those programs. (See the “Confidentiality and Disclosure” section in the *Eligibility Manuals for School Meals* posted on the DEED website at education.alaska.gov/tls/cnp/nslp4.html).

8. Which district staff need this information?

District staff that may need this information include school meal personnel, Title I-A coordinators, assessment and accountability staff, business managers, and superintendents. These staff should be familiar with these requirements. The information is confidential and should be shared only as necessary.

9. Who should I contact if I have questions about school meal programs and eligibility for free or reduced meals?

Contact the DEED School Meal Program Coordinator, Tonia Parfitt (Tonia.Parfitt@alaska.gov), at (907) 465-3596 or Child Nutrition Program Manager, Gavin Northey (Gavin.Northey@alaska.gov), at (907) 465-8708.

10. Who should I contact if I have questions about criteria for economically disadvantaged status for Title I programs, for accountability for the economically disadvantaged subgroup, or for school poverty data for Title I allocations?

Contact the [DEED Title I-A Program Manager](#) for your district.