



Arizona Department of Education

MEMORANDUM

To: Local Educational Agencies' Data Stewards

From: Melissa Conner, Associate Superintendent
Arizona Department of Education, Health and Nutrition Services Division
Kelly Koenig, Associate Superintendent
Arizona Department of Education, Student Achievement and Educator Excellence

Date: November 16th, 2020

Subject: Submitting Income Eligibility I and II and FRL for FY 21

The purpose of this memorandum is to clarify the Arizona Department of Education (ADE) requirements and recommendations regarding Income Eligibility I and II and Free and Reduced Lunch (FRL) data collection while operating under the Summer Lunch Program in response to COVID-19. This change has been made to serve the most students possible. However, this change means that the cyclical process of distributing and entering National School Lunch Program (NSLP) data as part of regular participation has also been interrupted. LEAs have also reported lower response rates for families completing an NSLP or alternative form.

For LEAs to have the most accurate data possible, at both the student and LEA level, LEAs should complete the following steps:

1. LEAs with a Food Program Permanent Service Agreement for the National School Lunch Program and who ordinarily operate the NSLP, continue to be required to use the CNP Direct Certification system and perform Direct Certification activities for students despite operating the SFSP/SSO this school year. Schools may indicate all Directly Certified students as Income Eligibility I.
2. Schools may send out an [alternate income form](#) to collect Income I and II eligibility indicators to identify the income eligibility of a student. Please remember that if alternate income forms are collected, the cost of the alternate income application disbursement, collection and processing cannot be paid from the nonprofit school food service account. The alternative income form is available in Spanish [here](#). Schools may also utilize digital versions of the form to collect information remotely.
 - a. If a school chooses to use a combination of Directly Certified students and to send out an alternate income form, please ensure that a student is not overtly identified.
 - i. Recommendation: Send out the alternate income form to all families, even if a student is known to be Directly Certified.
 - b. Students who meet the Income Eligibility I guidelines and/or are Directly Certified shall be marked as a '1', students who meet the Income Eligibility II guidelines shall be marked as a '2' and students who do not meet either income threshold shall be marked as a 0. If a school has not collected income eligibility for a student, the student shall be marked as a '0' in AzEDS.
 - c. To review the Income I and Income II Eligibility guidelines, please review the alternative income form located here: <http://www.azed.gov/titlei/>
3. Schools ought to then enter student-level, October 1st data in AzEDS by the tentative **January 15th** deadline to reflect the most accurate, student-level information.
4. Schools should maintain local, auditable documentation to substantiate the reporting of all student-level AzEDS Income Eligibility data.

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 information as possible for this school year. To mitigate any data shortcoming for the current school year, ADE will be working with our State legislature as well as on a Federal level to ensure school numbers are reported and funded appropriately.

In conclusion, it is important for LEAs to collect as much data as possible on student income eligibility for education benefit purposes. The benefits of extending the Summer Program ensure that students receive meals regardless of physical attendance in a brick and mortar school. Providing services to students and supporting schools shall remain our top priority as things change in the coming year.

If you have specific questions regarding the collection of income eligibility data, please contact Caitlin Drake by email at Caitlin.Drake@azed.gov or by phone at 602-542-4343

Please contact your School Nutrition Programs Specialist at ADE with questions concerning this guidance. Your assigned specialist can be found at the top of the Sponsor application in CNPWeb. You may also send an email to ADESchoolNutrition@azed.gov or call 602-542-8700, option 2.

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