Arizona Department of Education
Education and School Excellence

Submitting ESEA (Title I) Income Eligibility 1 and 2 for FY22

Dear Educators,

The purpose of this memorandum is to clarify the Arizona Department of Education (ADE) requirements and recommendations regarding Income Eligibility 1 and 2 and Free and Reduced Lunch (FRL) data collection while operating under the Seamless Summer Option (SSO) in response to COVID-19. The purpose of the waiver to allow the SSO to operate through June 30, 2022 is to support access to nutritious meals while minimizing exposure. However, this change means that the process for calculating the free and reduced-price percentage report using the National School Lunch Program (NSLP) claim has also been interrupted.

TITLE I LEA LEVEL ALLOCATIONS

While SAIPE 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 FRL data as well as through AzEDS as indicator 1 and indicator 2. From these two sources, the highest calculated poverty rate is chosen for each LEA. With the extension of the SSO, HNS is advising that they will not have NSLP claim data to report for LEAs operating under SSO or Community Eligibility Provisions (CEP). Therefore, those LEAs will need to rely on AzEDS poverty data, entered through their Student Information System (SIS) for Title I FY23 funding.

Step 1: Free and Reduced Lunch Forms

Enter Free eligibility as indicator 1 and enter Reduced eligibility as indicator 2.

If an LEA has identified Free and Reduced Lunch eligibility, but is operating under SSO or CEP, even though those students may be marked as Free or Reduced within the SIS, they must also be marked with an Income Eligibility indicator 1 (free) or 2 (reduced) for that poverty information to be sent to AzEDS.

Step 2: 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 form (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). When entered as indicator 1 or 2, the SIS will communicate with AzEdDS. ==Update! 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. 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. Poverty Percentage training can be found here.

- Data must be entered and validated prior to the January 15 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 information as possible for this school year. Providing services to students and supporting schools shall remain our top priority as we move forward.

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

FAQs

Will the Dept of Ed be providing any flexibility for the use of alternative data for FY23 funding?

No, at this point, we have not received any indication from the Dept of ED that we will be allowed to use older year data for either the LEA level allocation calculation or the site level allocations (rank and serve).

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What is the difference between Free and Reduced Lunch form and Income Eligibility form?

Free and Reduced lunch forms can be used to collect poverty data for Title I and other Federal programs, however, The United States Department of Agriculture (USDA) has previously released guidance that LEAs are prohibited from distributing and processing 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.

Can Income Eligibility form 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 October 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 data is used for site level allocations (rank and serve)?

LEAs typically use their 40th or 100th day ADM enrollment. For poverty percentages, Section 1113(a)(5)(A) of the ESEA provides an LEA the option to use the number of students (K-12):

- Eligible for free or reduced-priced lunch 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; 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

RESOURCES

Poverty Percentage Reporting

Presentation on Poverty Data

Poverty Data PowerPoint

Request Title I Data Sheet