

MEMORANDUM

To: Public Education Agency Data Coordinators

cc: Public Education Agency Administrators

From: Academic Achievement

Date: July 2, 2025

Subject: Guidance on Use and Administration of the Alternative Form for Income Eligibility 1 or 2 for October 1 Poverty Data Collection and Submission

What is the Alternative Form for Income Eligibility 1 or 2?
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The Arizona Department of Education (ADE) collects October 1 enrollment and poverty counts each year to comply with the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act and A.R.S § 15-1042. This data informs federal funding eligibility, supports federal reporting, and contributes to statewide statistics on Arizona schools. It also serves as the poverty metric for Title I-A grant applications and the rank and serve processes.¹

The Alternative Form for Income Eligibility 1 or 2 (Alternative Form) is a data collection tool used only under the following two conditions:

- 1) The school site(s) does not operate National School Lunch Program (NSLP).
- 2) The school site(s) operates Community Eligibility Provision or Provision 2 or 3 of the NSLP.

The Alternative Form provides a consistent method for collecting poverty data from schools like online schools, alternative schools, and other schools not using the standard NSLP food program applications or direct certification.

If the Local Education Agency (LEA) operates only NSLP school sites, then the LEA will use the standard NSLP food program applications or direct certification ([USDA NSLP Household Application](#) and [CNP Direct Certification](#)) to report student income eligibility.²

Annual Requirement and Time-bound Income Status

The Alternative Form is updated annually based on income thresholds published in the **U.S. Federal Register: Child Nutrition Programs – Income Eligibility Guidelines**. These thresholds align with family income between **July 1 and June 30** of the corresponding year.

Key points:

- **Forms cannot be backdated when signed.** Parents or guardians may only sign the form on or after July 1 of each year.
- A student's eligibility is effective from the **start of enrollment or the signature date through the end of the school year**, whichever is last (See below Submitting October 1 Poverty Data in Arizona Education Data Standards (AzEDS)).
- **A new form is required each year for each student.** For example, a family with three (3) children must submit three completed and signed forms annually. Three forms for three children each year.
- Within the same school year, a student's eligibility **status transfers** within an LEA between schools as part of student record transfer. Transfers across LEAs require the new LEA to make specific requests from previous LEA for the Alternative Form as part of student record transfer

LEAs can find the template for the Alternative Form on the **ADE Academic Achievement website** (<https://www.azed.gov/titlei>).

LEAs may use paper or digital versions of the Alternative Form but **must not** alter the content. Translations are allowed as needed to ensure accessibility for all families.³

LEA Responsibilities for Administration and Record Keeping

The Alternative Form is a tool to bring more educational services to the school and community through Title I-A allocation. LEAs have due diligence for:

- Ensuring annual and accurate completion of the Alternative Form by families, reflecting income eligibility for the July 1 – June 30 period.
- Maintaining signed copies of all completed Alternative Forms for four (4) years after the student's last attendance⁴ and available for audit by ADE School Finance.
- Informing families about the role of the Alternative Form in Title I-A funding decisions and its benefits, as well as offering support to families when completing them. For example, understanding that income calculation excludes the value of meals, milk, or EBT.

Failure to properly administer the Alternative Form may impact LEA federal funding, state funding, accountability determinations, and may trigger program monitoring or enforcement action by ADE.

Submitting October 1 Poverty Data in Arizona Education Data Standards (AzEDS)

When reporting income eligibility 1 and 2 data in the Arizona Education Data Standards (AzEDS) for poverty as part of October 1 counts based on the Alternative Form or Direct Certification data, LEAs must follow these timelines:

1. Direct Certification (DC) - conducted **ONLY** by sites operating NSLP

- **Start Date or Result Date:** The date the **Direct Certification (DC) file was pulled** that identified the student as eligible with officially matched qualifying program (e.g., SNAP, TANF).

2. Alternative Income Eligibility Form

- **If the student is enrolled on the first day of school use the first instructional day of the school year** as the eligibility start date or result date.

- **If the student enrolls after the first day of school, use the student's enrollment date** as the eligibility start date.
- This ensures eligibility aligns with the student's actual participation in the school year.

Note on Timing: While no formal grace period exists, best practice is to collect and enter eligibility data **within 30 calendar days** of the student's enrollment to ensure timely and accurate reporting.

ADE thanks you for your continued efforts to support accurate data collection and maximize funding for Title I-A programs benefiting Arizona's students and educators.

For questions, please contact the ESEA Department at: ESEA@azed.gov.

¹ Arizona Department of Education, "ESEA Within District Allocation Quick Reference: Rank and Serve under Title I, Part A, July 1, 2025.

<https://www.azed.gov/sites/default/files/2025/06/ESEA%20Rank%20and%20Serve%20guide.pdf>

² Arizona Department of Education, "Memorandum: Guidance on Reporting Income Eligibility 1 or 2 Needs and Students School Food Service Program Association data into Arizona Education Data Standards (AzEDS)", June 24, 2025.

<https://www.azed.gov/sites/default/files/2024/11/241126%20-%20Guidance%20on%20Reporting%20Income%20Eligibility%201%20or%202%20Data%20into%20Arizona%20Education%20Data%20Standards%20%28AzEDS%29.pdf>

³ Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.) and the U.S. Department of Education's Office for Civil Rights (OCR) has clarified that essential communications about programs services, or benefits must be provided in a language the parent understands, January 7, 2015.

⁴ Arizona General Records Retention Schedule GS-1074, which applies to all public school districts and charter schools.