



38 Eastwood Drive, Suite 100
South Burlington, VT 05403

P: (802) 865-0255
F: (802) 865-0266
HungerFreeVT.org

To: House Education Committee
From: Anore Horton, Executive Director, Hunger Free Vermont
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Subject: **Summary of the Benefits of a Universal Income Declaration Form, and Its Connection to Successful Enactment of Permanent, Statewide Universal School Breakfast and Lunch**

An act relating to improving student equity by adjusting the school funding formula and providing education quality and funding oversight, as passed by the Senate Finance Committee, includes the creation of a Universal Income Declaration Form to be used by all Vermont schools for the purposes of collecting household income information for all enrolled students. This memo lists the key benefits of having the State of Vermont develop and implement this form.

The Universal Income Declaration Form can be simple and easy for parents and guardians to complete, while still meeting all requirements for accessing a wide range of federal education funding for both school-wide programs and supports for individual students living in economically disadvantaged households.

- Determining income eligibility can be as simple as checking a box next to an income range.

Federal regulations permit School districts to require all families to complete and submit the Universal Income Declaration Form (whereas school meal applications may not be required by schools).

- Requiring that all families complete the form will provide a more accurate count of the number of students from economically disadvantaged households, permitting school districts to access more federal education dollars, while also permitting specific state funds to be properly distributed.

Putting the Universal Income Declaration Form in place simplifies the transition to statewide universal school meals envisioned in S.100, since all schools will be able to collect household income information for state and federal education funding purposes without needing to rely on school meal applications for this purpose.

Small, rural schools and schools serving higher income communities stand to benefit the most from the adoption of the Universal Income Declaration Form.

- The use of either household enrollment in 3SquaresVT or student enrollment in the free and reduced-price school meal program is known to significantly undercount the number of pupils living in households with incomes at or below 185% of the Federal Poverty Level (the measurement named in the bill to be used in determining state allocation for pupils who are economically disadvantaged, and also the measurement used to define which students are “low income” for purposes of distributing many types of federal education funding).
- The undercount is known to be greatest in the schools with the fewest “low income” students. In small, rural towns and schools, everyone knows everyone, making families reluctant to be known as needing food help. In schools serving higher income communities, students eating free meals or using special school services stand out among their better-off peers. Both kinds of stigma are powerful, and have meant that in a majority of Vermont schools, many state and federal resources that should be supporting these students and supporting school programs are not reaching these schools and have not been reaching these schools for decades.

Because the federal Department of Education gives states great flexibility in the design of the Universal Income Declaration Form, it can be easily adapted should the General Assembly wish to make adjustments to its measurement of who counts as an “economically disadvantaged” pupil in the future.

The language from the [bill as passed by Senate Finance](#):

Sec. 5. UNIVERSAL INCOME DECLARATION FORM

(a) It is the intention of the General Assembly that, beginning with the 2023–24 school year and thereafter, the determination of whether a pupil is from an economically deprived background be changed from eligibility for free or reduced-price school meals to eligibility based upon family income of 185 percent or less of the current year Federal Poverty Level, with data collected from a universal income declaration form.

(b) A universal income declaration form is used by some other states and school districts in Vermont with universal school meals programs to collect household size and income information that was previously collected using the Free and Reduced-Price Meal Application. A universal income declaration form is used to collect income bracket information from all families, reducing stigma and resulting in the collection of more accurate pupil eligibility counts throughout a school district.

(c) On or before October 1, 2022, the Agency of Education shall convene a working group that includes school staff and hunger and nutrition experts to develop the universal income declaration form that shall be fully accessible to all Vermont families. The new form shall be implemented statewide for the 2023–24 school year. Until that form is implemented, school districts shall continue to determine whether a pupil is from an economically deprived background using eligibility for free or reduced-price school meals.