



Testimony Regarding Current Poverty Measures & Implementing a Universal Income Declaration Form for the House Committee on Ways & Means

Submitted by Anore Horton, Executive Director, Hunger Free Vermont

(802) 231-12933 / ahorton@hungerfreevt.org

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Thank you for the opportunity to provide testimony to the House Committee on Ways & Means regarding Sections 4 and 5 of the education finance restructuring (pupil weighting) bill.

I have two main points:

1. The two main ways we determine which students are economically disadvantaged right now (household enrollment in 3SquaresVT and enrollment in free or reduced-price school meals) significantly undercount the true number of students from “economically deprived backgrounds.” **Hunger Free Vermont supports the changes to the current approach in Sections 4 and 5 of draft 4.3 of DR 22-0593.**
2. The Universal Income Declaration Form is a flexible and powerful tool that can collect key data needed to both identify students from economically deprived backgrounds for purposes of pupil weighting, and maximize school districts’ ability to access and use a wide range of federal education funding for both entire schools and individual students. **Hunger Free Vermont supports the current language in Section 5 of draft 4.3 of DR 22-0593.**

Elaboration of Point 1: Enrollment in 3SquaresVT and/or a school’s free and reduced-price meals program significantly undercounts the true number of students from economically deprived backgrounds.

- The State of Vermont has used either household enrollment in 3SquaresVT (SNAP) or student enrollment in their school’s school’s free and reduced-price meal program to count the number of students living in poverty for accessing and distributing a wide range of federal and state education funding.
- The proxy that has been used to count the number students in poverty for Vermont’s pupil weighting has been a student’s household’s enrollment in 3SquaresVT.
- Eligibility for both 3SquaresVT and free/reduced-price school meals is a household income at or below 185% of the Federal Poverty Level (FPL). That is, for example, a maximum of: \$32,227 for a family of one parent and one child; \$40,626 for a family of one parent and two children; \$ 49,025 for a family of 2 parents and two children.

- Both of these approaches inevitably and always undercount the number of low income students attending any given school, because these approaches measure access and use of specific federal programs, rather than eligibility for those programs. Many households that are eligible for free school meals do not complete the applications to enroll their children. Even more eligible households do not choose to apply for 3SquaresVT.
- This means that using school meal applications to count the number of “low income” students for Title I funding and other similar purposes leaves federal education dollars--and federal school meal program dollars--in DC that should be flowing to Vermont schools.
- Eligibility for 3SquaresVT and school meals (a household income of 185% FPL or below) also undercounts the true number of students who experience the harmful consequences of living in households that have inadequate income because the cut-off to qualify for either 3SquaresVT or free school meals in Vermont (\$49,025 annually for a family of 4) falls well below the \$57,814 Vermont’s JFO calculates is required to fund the annual Basic Needs Budget for a family of 4 in our state.
- Many children, for example, live in food insecure households that are over-income for 3SquaresVT and free school meals--the Urban Institute estimated in a 2019 study that up to 42% of all food insecure children in Vermont could be living in such households.
- The number of families with children who will not be able to meet their basic needs, and who therefore will experience the mental and emotional stress, health challenges, school readiness and attendance challenges, and other consequences of being low income, is likely to continue to grow, given the current severe shortage of affordable housing, combined with rapidly rising food and housing costs in Vermont, and the continuation of the COVID-19 pandemic.
- **The income cut-off for designating a student’s household as “low income” in Vermont is a policy decision, and a funding decision, that the legislature must make, and ought to revisit as economic circumstances warrant. The current language in this bill allows for adjustments to be made to this income cut-off in the future, which we strongly support.**

Elaboration of Point 2: The Universal Income Declaration Form is a flexible and powerful tool that can more accurately identify students eligible for a wide range of federal and state educational supports.

- With the advent of the Community Eligibility Provision (CEP) in 2013, and the subsequent dramatic expansion of universal school meal programs, many more schools have no longer been collecting school meal applications annually or at all. This was the case for over 25% of Vermont’s public schools in 2019, and we expect this number to continue to increase.

- The U.S. Department of Education created the option for states to develop and use alternative income information forms (like the Universal Income Declaration Form proposed in the pupil weighting bill) to address the need for school districts to continue to collect income information in order to draw down Title I and other federal education funding tied to the number of “low income” students attending specific schools.
- **When school districts use best practices to distribute and collect an alternative income information form, the result is a highly accurate count of all economically deprived students. This is because while school districts are legally prohibited from requiring all families to fill out school meal program applications, they may require every family to fill out and submit the Universal Income Declaration Form. (Note: the State may *not* require school districts to require this form.)**
- **The Universal Income Declaration Form is a tremendous opportunity to solve multiple problems with one form, because the U.S. Department of Education permits states considerable flexibility in its design.**
- It is important that any form designed by the State of Vermont uses every available best practice for content and design, so that it collects all needed information in the simplest, least intrusive way possible, while still complying with federal requirements, as is provided for in the current version of Section 5 of the bill.

Thank you so much for working to develop a way to properly measure and accurately count all economically disadvantaged students, while reducing the stigma and burden associated with collecting income information from families. The work you are doing is so important for Vermont’s children, families, and schools.