



## **Comments for the Senate Finance Committee Regarding 22-0593, an act relating to improving student equity by adjusting the school funding formula and providing education quality funding and oversight**

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**2/23/2022**

**Hunger Free Vermont respectfully offers these five comments relating to Sections 4, 5, and 18 of 22-0593, “an act relating to improving student equity by adjusting the school funding formula and providing education quality funding and oversight”:**

1. Hunger Free Vermont strongly supports eliminating household enrollment in 3SquaresVT (SNAP) as the way to measure whether a pupil is counted as “from an economically deprived background” because 3SquaresVT enrollment significantly undercounts both the number of pupils who experience economic deprivation, and the number of pupils whose household income is at or below 185% of the Federal Poverty Level.
2. Hunger Free Vermont strongly supports changing the measurement of who counts as a pupil “from an economically deprived background” to one determined by the General Assembly.
  - a. It is smart for the General Assembly to retain the ability to determine and adjust this measurement because as more data is collected about how the adjusted school funding formula is affecting student equity and education quality over time, more information will be available to help the General Assembly make better decisions about how to determine which pupils are from economically deprived backgrounds.
  - b. However, making this measure “not lower than 185% of the 2021 Federal Poverty Level” creates future concerns, because the Federal Poverty Level is regularly adjusted, and the income limits for eligibility for several kinds of federal education funding is tied to this adjusted FPL. In order to make it easy for the universal income declaration form to serve multiple needs for school districts, **we recommend deleting 2021 and replacing it with the *current* year FPL.**
3. Hunger Free Vermont strongly supports the development and implementation of a universal income declaration form by the Vermont Agency of Education for school year 2023-2024. The creation of a form that school districts may require all families

to complete will more accurately measure the number of pupils from economically deprived backgrounds in each school district.

- a. We emphasize that the full participation of school staff in this process is critical in order to produce a form that is easy and quick for all families to complete accurately, and that is easy and efficient for school staff to distribute, collect, and process.
4. Hunger Free Vermont strongly supports the creation of six new positions in the Vermont Agency of Education to support the implementation of this bill's provisions, including to "convene a working group, including school staff and nutrition experts," to develop a new universal income declaration form "that is fully accessible to families," uses all available best practices, and to support its implementation ahead of school year 2023-2024.
  5. **Hunger Free Vermont recommends that schools be afforded maximum flexibility in choosing which method they use to determine which pupils are "eligible for free or reduced-price lunch under the National School Lunch Act" in school year 2022-2023. Schools should be able to use free and reduced-price school meal applications, direct certification, their Identified Student Percentage, and/or the current Household Income Form to count pupils from economically deprived backgrounds in this transition year.**
    - a. We understand that the Vermont Agency of Education needs time to develop and implement a new universal income declaration form, and the interim measure of "a pupil who is eligible for free or reduced-price lunch under the National School Lunch Act" will be used to determine whether a pupil is "from an economically deprived background" for school year 2022-2023.
    - b. The federal school meal program waivers enacted in response to the COVID-19 pandemic have been providing school meals at no charge to all students without requiring families to complete school meal applications. Many schools will either be returning to the universal school meal programs they operated prior to the pandemic, or will be newly starting such a program. Even in schools needing to collect school meal applications in SY 22-23, it may be challenging to help families understand why they need to fill them out again after two years.
    - c. All of these methods use at or below 185% FPL as their definition of a "low income" household. All of these methods are accepted for documenting school and student eligibility for a wide range of federal education funding and supports.
    - d. We should allow for the least stressful and time-consuming approach for already over-extended school staff and families during this particularly challenging time, while still giving each school the best chance to collect accurate and complete information from families that will determine a key component of state education funding for the coming school year.

**Thank you so much for understanding the importance of eliminating stigma for our students and their families. The work you are doing is so important for Vermont's children, families, and schools.**