

# **Identifying Students from Economically Disadvantaged Backgrounds for Long- Term Weighted ADM**

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**Vermont Agency of Education**

**Testimony to House Committee on Ways and Means**

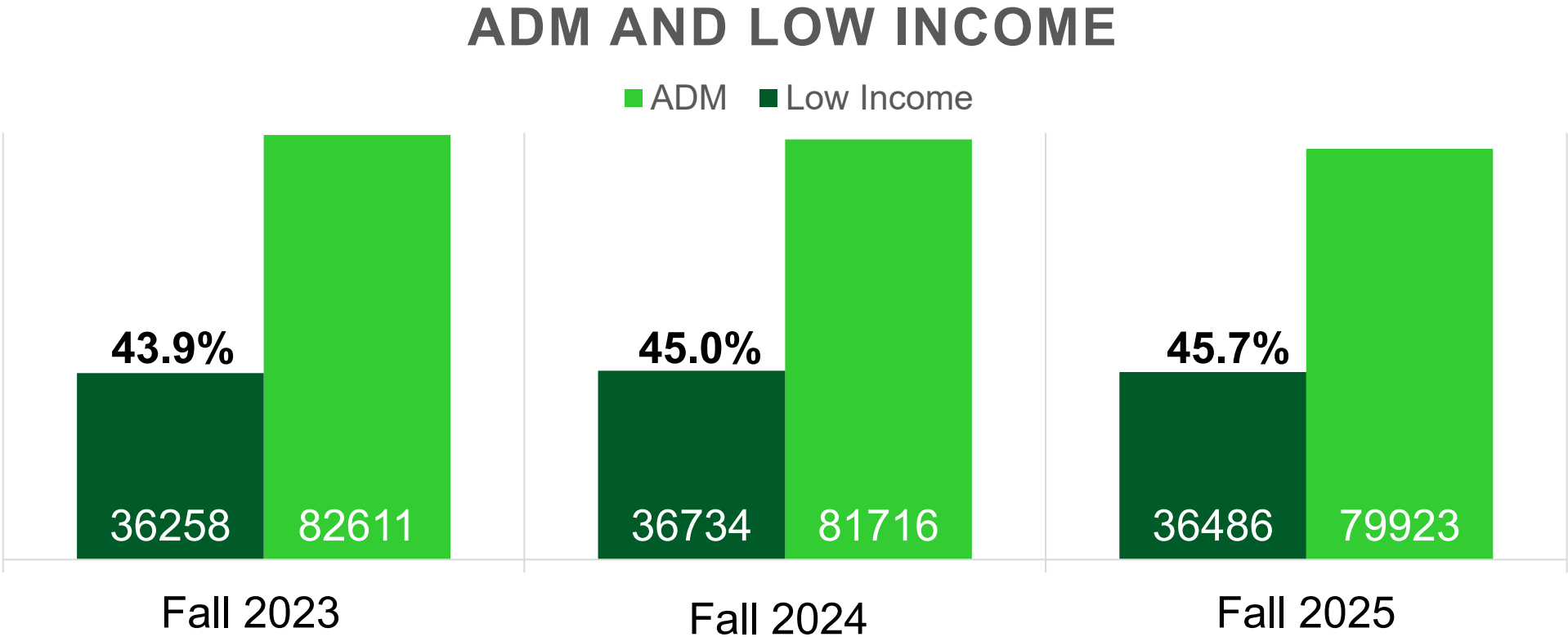
**January 29, 2026**

# Topics

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- Sources of Low-Income Data used for Long-Term Weighted ADM
- Sources of Direct Certification
- Potential impacts of H.R. 1 on Direct Certification
- Household Income Form process
- Timeline & Roles
- Training & TA provided by AOE
- What SU/SDs can do to increase low-income counts
- Common areas of confusion

# Statewide Low-Income & ADM Counts Over Time



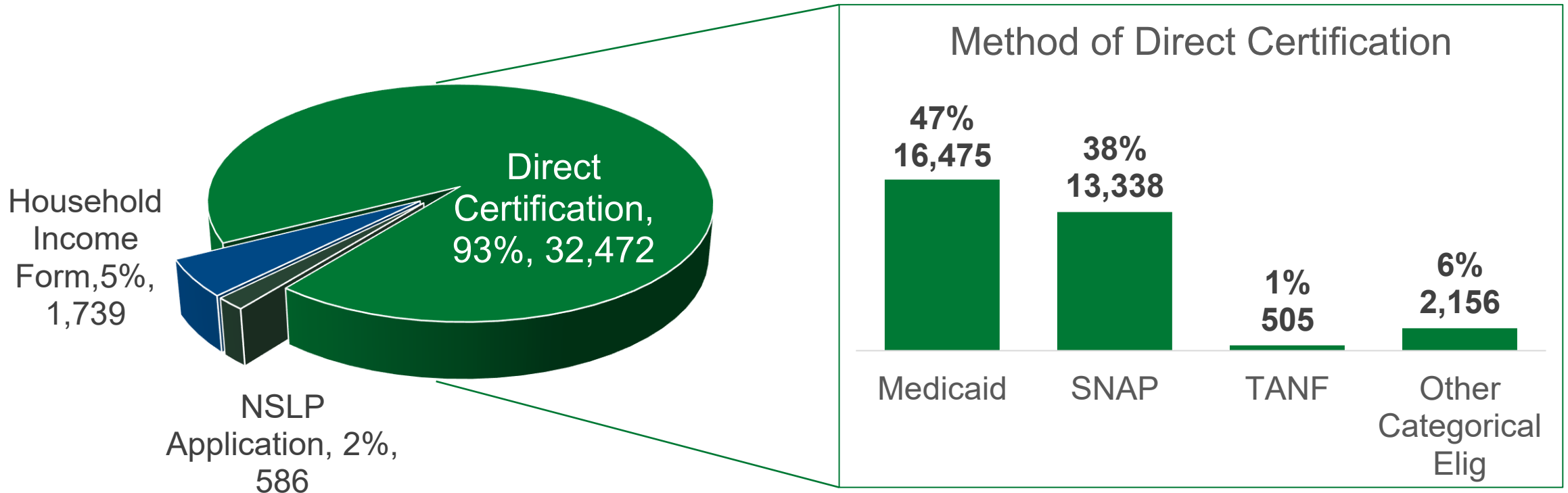
# Sources of Low-Income Data for LTWADM and other Education Programs

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- In order of precedence:
  1. Direct Certification for Free/Reduced School Meals
  2. National School Lunch Program Applications, when allowed
    - No Vermont public schools are allowed to collect NSLP applications in School Year 2025-2026 because there is not a school meals need to collect these applications (Operating CEP or a non-base year of Provision 2 to provide Universal School Meals)
    - 5 independent schools that participate in the NSLP and do not offer Universal School Meals are allowed to collect NSLP applications
    - Every 5<sup>th</sup> year a small number of public schools participation in Provision 2 collect NSLP applications
  3. Household Income Form (AKA “universal income declaration form” in statute)

If low-income data is available from multiple sources for an individual student, it is used according to this order of precedence. For example, if a student is Directly Certified and also submits a Household Income Form, the Direct Certification data is used as the basis for their low-income status.

# Low Income Students by Identification Method, SY2025



# Sources of Direct Certification

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The local-level (SU/SD or School-Level) School Meals Determining Official makes the determination based on:

- AOE lists of students receiving 3SquaresVT, Reach Up, State-Placed Foster & Medicaid under 130% and 185% of the Federal Poverty Level (FPL)
  - AOE receives this information monthly from the Agency of Human Services and matches to enrolled students at each SU/SD through either:
    - Monthly Automated Ed-Fi matching process based on students listed as enrolled in the SU/SD Student Information System.
    - Manual upload of student match form that allows the data manager to submit a file of students for direct cert matching
- Any students living in the same household as students on 3SquaresVT, Reach Up, & Medicaid 130% and 185% FPL
  - Local-level determining official needs to identify these additional students living in the same household to extend status to them.
- Migrant students, identified in separate electronic file from AOE
  - New process this year, previously was a mailed letter
- Homeless students, identified by SU/SD Homeless Liaison
- Runaway students, identified by SU/SD Homeless Liaison
- Head Start students, identified by Head Start teacher

# Direct Certification Timeline

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- Per federal regulation, Direct Certification status is cumulative over the course of the school year.
- If a student participates in a program that confers eligibility at any point in the school year, they stay eligible for the rest of the school year, even if they stop participating in that benefit program.
- The DC list re-sets on July 1 to only include students who are participating in benefit programs at that point in time.
  - This re-set results in a drop in the number of students on the list from AOE between June and July every year.
  - This drop is expected. It does not indicate an error in the process.
- School meals regulations allow schools to carry over the student direct certification status for up to the first 30 operating days of the school year if new qualifying information has not been received.
  - Most Vermont schools carry over prior year status until the 30<sup>th</sup> operating day, usually in mid-October.
  - The DC06 Fall Data Collection is date-based, so if a student's prior year status is carried over past October 1, they will be included in the low-income count for the current year because they were considered low-income on October 1.

# Potential Impacts of H.R. 1

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- H.R. 1 has the potential to reduce the number of children directly certified through 3SquaresVT and Medicaid in future years.
- Direct Certification Data is cumulative over the course of the school year, so children enrolled in these programs on July 1 are directly certified for the entire school year, plus the first 30 operating days of the following school year (mid-October).
- H.R. 1 impacts didn't take effect until partway through School Year 2025-2026, so children who were in these programs as of July 2025 will continue to be counted as low income through the Fall 2026 data collection (October 1).
  - Any reductions in direct certification due to H.R. 1 wouldn't be felt until the Fall 2027 data collection (FY29 budget year).
- AOE is working with DCF and DVHA to determine whether H.R. 1 will significantly impact the number of families with children directly certified based on these programs.
  - SNAP work requirements apply to households with children age 14 and older, so the number of younger children directly certified should not be impacted. There are other ways to be exempt or meet the requirement that may apply to adults in households with older children.
  - Vermont has expanded Medicaid eligibility up to 312% of the federal poverty level – but only children in households under 185% of FPL are directly certified. It is not yet clear whether the H.R. 1 changes will significantly impact participation in Medicaid for households under 185% FPL with children.

# Household Income Form (AKA Universal Income Declaration)

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- The HIF is available for use when a school cannot use the NSLP application to gather low-income data for students who are not otherwise captured through Direct Certification.
- AOE hosts an electronic form and routes entries to appropriate SU/SD data manager.
  - <https://education.vermont.gov/householdincome/2025-2026-household-income-form>
- Some SU/SDs host and process their own electronic version of the form locally.
- AOE also provides a paper version, available in 13 languages including English, that schools can provide to families. Paper forms are returned to the local school building or SU/SD.
- School meals funding cannot be used to process the HIF, so typically someone other than the determining official is responsible for managing this process – often it is the Registrar.
- AOE has promoted the use of the form through a “Fill the Form” campaign, and provides “Fill the Form” materials that schools can customize to promote the form locally.

# Roles – State of Vermont

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- Department for Children and Families, Agency of Human Services
  - Provides 3SquaresVT, Reach Up, State-Placed Foster data to AOE monthly
- Department of Vermont Health Access, Agency of Human Services
  - Provides Medicaid data filtered to students in households under 185% FPL and 130% FPL monthly
- Agency of Education
  - Matches enrolled students to AHS and migrant data & provides lists to SU/SD data managers
  - Hosts statewide electronic Household Income Form & receives form submissions from households
  - Matches statewide electronic HIF submissions to SU/SD and provides info to SU/SD data managers
  - Receives low-income determination data back from SU/SD Student Information Systems through Fall and Spring Data collections (DC 06 and DC 04) using Ed-Fi process
  - Assists SU/SD data managers in identifying data irregularities through data quality checks on Ed-Fi submissions
  - Conducts and publishes low-income calculations for LTWADM (October 1), and VED Report (Full Year)
  - Provides training and technical assistance to data managers, determining officials, registrars, and other administrators on the direct certification, household income form, and data submission processes

# Roles – Local Level (Part 1)

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- SU/SD Data Managers

- Keep enrollment updated in SIS & submit manual match files to AOE when SIS is not up to date/actively matching so that AOE can match against state-level sources
- Provide AOE matches to determining official(s)
- Ensure that all determinations made by determining official and Household Income Form data are entered into Student Information System
- Troubleshoot data quality issues flagged by AOE during the Ed-Fi data submission process
- Certify accuracy of each data collection so it can be finalized

- Determining Officials (SU/SD or school level)

- Directly Certify students for free and reduced-price meals using the state and local sources, according to federal school meals regulations & notify households of determinations.
- If applicable, process Free & Reduced Meal Applications

# Roles –Local Level (Part 2)

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- SU/SD Homeless Liasson
  - Provide lists of Homeless/Runaway students to determining official
- Head Start Teachers
  - Provide lists of Head Start students to determining official
- Registrar (or other Household Income Form official(s) at the SU/SD or school level)
  - Promote Household Income Form to families
  - Process paper Household Income Forms
  - If a local electronic Household Income Form is used, manage that process and process submissions
- Superintendent
  - Certify accuracy of SU/SD data after data manager has certified, before it can be used for LTWADM calculations

# Training & TA Provided by AOE

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In the last year:

- AOE Child Nutrition Programs (CNP) has provided 3 web-based trainings (live, with available recordings) on the direct certification process for determining officials, data managers, and business managers;
- AOE CNP has shared thorough written guidance on direct certification with determining officials, business managers, and data managers on several occasions via email listservs;
- AOE CNP staff have provided 1:1 assistance to many SU/SDs via phone, email, and in-person during school meals administrative reviews;
- AOE Data Management and Analysis Division (DMAD) has provided 4 trainings to data managers and registrars on the Household Income Form;
- DMAD offered 1:1 trainings for data managers and registrars who couldn't make a scheduled training or needed additional technical assistance;
- AOE provided a training to Superintendents on this process and common issues that might cause an SU/SD's low-income data to be lower than anticipated;
- A [dedicated webpage of HIF guidance](#) for SU/SDs and a HIF toolkit of templates has been sent to relevant listservs and shared during trainings.

# What SU/SDs can do to increase low-income counts

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- Ensure determining official(s) and data managers are well-trained.
- Ensure that data manager and determining official communicate regularly about direct certification, new enrollments, and school meals eligibility determinations.
- Ensure that Homeless Liaisons and HeadStart teachers share info with determining official(s).
- Ensure the Student Information System is up-to-date with all enrolled students and current school meals eligibility and HIF information for each student.
- Encourage families to enroll in assistance programs that they may be eligible for.
  - [3SquaresVT Outreach](#)
- Encourage families to submit Household Income Forms.
- Clarify the SU/SDs process for receiving HIF information and entering it into the SIS.
  - How will the form be promoted to families?
  - Where should paper copies of the forms be sent?
  - Whose responsibility is it to process them?
- Ensure that the data manager is following up on data quality issues flagged for them by AOE as soon as the issues appear.

# Common Areas of Confusion

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- Local level officials are not clear on their role, or have not received training to conduct all activities.
- Data managers or determining officials erroneously assume AOE direct certification matches are comprehensive of all Direct Cert data and do not conduct local-level direct certification steps.
- Not understanding that the preliminary numbers provided to SU/SDs in the Fall reflect what was first submitted from the SU/SD student information system, and that data managers have an opportunity to correct the information before data manager and superintendent certify that the data is correct.
  - Statewide data has been delayed while we wait for local submissions.
  - Target is for completion of Fall Data Collection is mid-November.
  - Fall 2025 data collection submission and certification was not completed until mid-January.
- Erroneously blaming lower than expected low-income data on universal school meals instead of identifying actual data quality issue.
- Confusion between Oct 1 (DC06)/Full Year (DC04) low-income data collections and federally-required Child Nutrition data collections.
  - The Child Nutrition October 31<sup>st</sup> data collection shows number of children eligible for free and reduced school meals.
  - The Child Nutrition April 1 Direct Certification data collection shows number of children directly certified for free school meals.
  - Per federal requirements, reports showing data from the Child Nutrition data collections are posted on AOE's website. These reports are measuring different things, so they do not match the DC06/DC04 collections.

# Questions?

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