



October 7, 2019

Making Every Student Count

By Anastasia Martinez, Policy Analyst

All would agree that *every* child in Massachusetts deserves an excellent education. To turn this vision into a reality, our unequal public education system desperately needs to be remedied with state dollars to help our most disadvantaged students succeed.

The Joint Committee on Education just released the [Student Opportunity Act](#), that would ensure all kids from all communities and backgrounds *can* succeed by addressing funding inequities in the system. This act would revise the state’s education funding [formula](#) and provide significantly more state aid to many districts. **Among other changes, this bill proposes shifting how a low-income student is defined.**

Currently, low-income or “economically disadvantaged” students are those in families living at or below 133 percent of the Federal Poverty Level (FPL), that’s an annual income of \$34,248 for a family of four. **This proposal defines low-income students as those with family incomes up to 185 percent of the FPL**, or \$47,638 for a family of four.¹ This is a positive shift as it more realistically captures students in need of more support.

The challenge moving forward is that the proposed legislation does not specify the method for identifying this expanded group of students, though it requires the Department of Elementary and Secondary Education (DESE) to recommend a method by November 1, 2020 for use in the Fiscal Year (FY) 2022 budget.² **An accurate count is incredibly important to ensure that school districts with identified low-income (and English Language Learner) students receive the funding necessary to support all of their students.** These districts would receive additional funding for each student identified.³

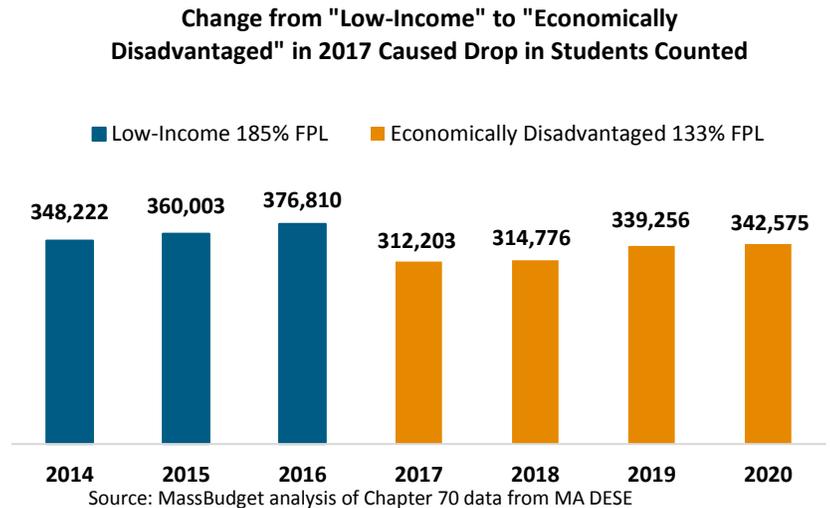
The reality is too many children in our schools face barriers due to lack of funding. An inaccurate count of low-income students means that school districts are not receiving adequate funding to support students with high needs. Low-income students are more likely to require a diverse array of academic and social resources to succeed in school, including supports such as [after school programs](#), [smaller class sizes](#) and [wraparound services](#). There are also particular challenges in getting an accurate count of low-income students who are immigrants or who have family members who are immigrants, and these students may be coming to school with unique educational needs. Communities with large numbers of immigrants are often disproportionately affected by the challenges of obtaining an accurate count of low-income students.

SOLUTIONS TO MAKE EVERY STUDENT COUNT

1. Provide additional support to outreach programs to ensure that all students are enrolled in programs for which they are eligible
2. Consider expanding the programs included in a direct certification data match
3. Supplement the current direct certification system with data from a separate income application form

CHALLENGES IN GETTING ACCURATE COUNTS OF LOW-INCOME STUDENTS UNDER THE CURRENT METHOD OF DIRECT CERTIFICATION

Fiscal year (FY) 2016 was the last year DESE based the Chapter 70 funding formula primarily on a count of students using the prior “low-income” measure of 185 percent FPL. In FY 2017, DESE switched to the current definition of low-income students.⁴ This definition, called, “economically disadvantaged,” lowered the income threshold to 133 percent of FPL and changed the methodology for identifying those students. The current methodology for direct certification defines students as economically disadvantaged based on their participation in Supplemental Nutrition Assistance Program (SNAP), Transitional Assistance for Families and Dependent Children (TAFDC), Foster Care (Department of Children and Families), and MassHealth up to 133% FPL. Schools are able to access enrollment data from these programs to match students on their rosters as economically disadvantaged.⁵



With the introduction of direct certification, the number of low-income students dropped notably (see chart). This was likely the result of several simultaneous issues: a change in the income threshold, transcription and data errors, and the fact that not all low-income students are enrolling in all programs for which they are eligible. Challenges include:

Reliance on data matching and misalignment between school rosters and program data.

There are [many reasons](#) why a student’s information might not at first match the listing in the public benefits databases, including: names might be misspelled in one of the lists, a student might have multiple last names that are entered differently, or a student’s name might be transliterated in different ways from a non-English alphabet. Certain groups of students, especially Latinx, Asian, and immigrant students are more likely to have names that create matching difficulties. For instance, Latinx surnames can be a hyphenated combination of the mother’s and father’s surnames. Asian names when transliterated to English may have spelling variations. There is some evidence that school districts have been able to address some of these challenges with data cleaning, but this requires dedicated administrative support (see discussions of New Bedford and Springfield below).⁶

Not all students are enrolled in all programs for which they are eligible.

Recent data reviews suggest that hundreds of thousands of people in Massachusetts who are potentially eligible are not enrolled SNAP.⁷ There are a variety of reasons for this. Some families may find the application process intimidating or cumbersome, others may feel a stigma attached to receiving assistance. Some may simply not know they are eligible or may fear their eligibility will affect other aspects of their life, such as immigration status.

Students from mixed-immigration status households face new challenges which could directly affect their local school districts’ funding.

Some students live in households where some members are documented and others are not. These households, known as mixed-immigration status households, may be less likely to participate in public benefit programs. Eligibility rules are complicated and not all low-income immigrants are eligible for the programs used in the direct certification process. DESE research found that recent immigrant students were identified as economically disadvantaged at a lower rate than under the prior counting method.⁸

Even if families are eligible, they may be reluctant to apply for benefits for fear of jeopardizing their immigration status. Moreover, starting in October, the Department of Homeland Security will be changing its definition of “public charge” for the purposes of immigration status.⁹

With these new and complicated regulations going into effect, there is risk that families who are eligible for benefits such as SNAP or MassHealth may choose not to participate in these programs. This is due to confusion and fear about the perceived (although potentially unfounded) impact on their own or their family member’s immigration status.¹⁰ This “chilling effect” could have a significant impact on the ability of school districts to rely simply on direct certification for an accurate count of students. Newcomers to the school system may be more likely to have limited English proficiency and have experienced an array of obstacles such as trauma and instability experienced during travel to the U.S.¹¹

If school districts with high concentrations of immigrant and mixed-status household students are disproportionately undercounting their low-income students, these same districts are disproportionately affected by the reliance on direct certification and are at more risk of being underfunded.

SOLUTIONS TO MAKE EVERY STUDENT COUNT

1. Provide additional support to ensure that all students are enrolled in programs for which they are eligible

DESE could provide additional support and resources to school districts and communities for outreach programs and assistance. This would ensure every potentially eligible student is enrolled in the programs included in the direct certification match. Districts could expand parent resource centers or develop formal relationships with community organizations to assist families with program enrollment.

| Provide Additional Supports | |
|---|---|
| Advantages | Challenges |
| <ul style="list-style-type: none"> Students will benefit from participation in programs that help put food on the table and provide access to affordable health care School systems will strengthen relationships with health navigators or program coordinators from other agencies This approach is simply an extension of the current system and requires limited new infrastructure. | <ul style="list-style-type: none"> Families may still resist enrollment in programs due to outside factors (fear, political climate, personal preferences, etc.) This option requires that the various public benefit programs have readily accessible application systems. |

2. Expand the programs included in a direct certification data match

California has included multiple categories and programs within their direct certification matching system. In addition to students identified through a database match with SNAP, TANF, and foster care, California includes categories of students eligible for free meals, such as migrant students, and homeless students.¹²

Massachusetts could develop a statewide "**common application**" for a range of needs-based programs in order to simplify applications and encourage participation. There is an item in the FY 2020 budget that provides money for a pilot program that would allow people to apply for SNAP at the same time they are applying to MassHealth, which would eliminate multiple cumbersome applications for programs.¹³ Massachusetts could also consider adding additional programs (such as homeless students identified by the McKinney-Vento homeless liaison) to the database match.

| Expand Programs in Direct Certification | |
|---|---|
| Advantages | Challenges |
| <ul style="list-style-type: none"> Including more programs and categories under direct certification will allow the counting of more students as economically disadvantaged. These programs may capture students who are not enrolled in SNAP, TANF, Foster Care, and MassHealth. | <ul style="list-style-type: none"> Adding other programs requires developing clear eligibility guidelines to ensure consistency across school districts and could require new data agreements or technical coordination. |

3. Strengthen current direct certification system with additional income forms

California and Kentucky use a hybrid system of direct certification and household income forms to determine the number of low-income students for their school funding formula.¹⁴ Massachusetts could adopt a similar system by providing schools with **alternative household income forms** for students unmatched in direct certification. Collecting these alternative forms on a periodic basis, such as every four years or whenever a student is new to a school district, would reduce some of the administrative burden on local school districts.¹⁵

| Strengthen Direct Certification with Additional Income Forms | |
|--|--|
| Advantages | Challenges |
| <ul style="list-style-type: none"> Students not matched through direct certification could be identified through alternative means. This is like the method currently used for school meals programs not participating in community eligibility. May allow for inclusion of children in immigrant or mixed-status households who are uncomfortable or unwilling to participate in public benefits programs. | <ul style="list-style-type: none"> Not centrally implemented, so risk of inconsistent practice at the local level. No consistent independent income verification system. Adding a new income form could be confusing for parents already filling out forms for school meals in non-community eligibility districts. |

The U.S. Census Bureau’s Small Area Income and Poverty Estimates program (SAIPE)

Some experts have suggested using SAIPE estimates to determine low-income student counts. Every year, the U.S. Census Bureau estimates the number of children ages 5 to 17 in families in poverty who live in each school district. Currently, SAIPE poverty estimates for school districts are used for the administration of federal programs and the allocation of federal funds to cities and towns, such as Title I funding.¹⁶

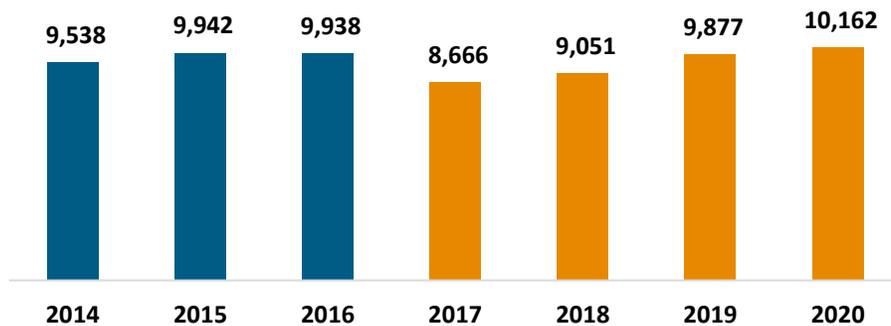
Using this method instead of direct certification would require some alterations. SAIPE estimates are only for children in the school district under 100 percent of the federal poverty level. This means Massachusetts would need to **develop a model to estimate the number of students at 185 percent of the federal poverty level**, using either a statewide, regional, or district-specific adjustment. Furthermore, SAIPE estimates do not provide individualized student information, and students may not attend school in the same district where they live.

To address the different thresholds used in SAIPE and low-income determination for Chapter 70, Massachusetts could be part of a state advocacy. This advocacy would encourage Congress to direct the census bureau to create SAIPE estimate at **various poverty levels**, allowing for multiple uses of the data.

A LOOK AT NEW BEDFORD AND SPRINGFIELD

Both New Bedford and Springfield have dedicated local resources to ensure students are enrolled in programs for which they are eligible and have therefore steadily increased their counts of low-income students. The student populations are very different in these two cities, so their experiences illustrate some of the opportunities and challenges that accompany direct certification.

New Bedford's low-income student count increases over time

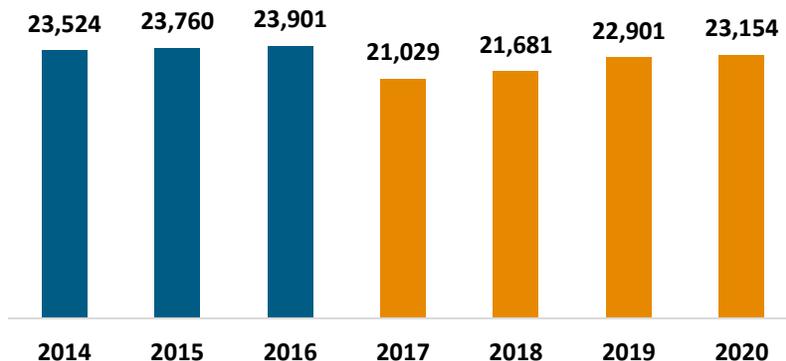


Source: MassBudget analysis of Chapter 70 data from MA DESE

New Bedford's Strategies¹⁷

- **Registration Center (Pre-K-12):** Opened 5 years ago to support parents in registering their children. Center also helped identify migrant, military, foster care, and homeless populations.
- **Frequent matching for school meal eligibility:** Weekly at the start of school, then monthly for remainder of year. This process continually updates the database records.
- **Collaboration with other offices:** Homeless and Foster Care population is hand-entered for school meal eligibility.
- **Obstacle:** Families are not signing up for MassHealth out of fear of deportation, therefore students are not receiving immunization needed to go to school.

Springfield's low-income student count increases over time



Source: MassBudget analysis of Chapter 70 data from MA DESE

Springfield’s Strategies¹⁸

- **Dedicated Staff for Counting:** Food service office takes the lead, along with 3-4 people in the central office.
- **Frequent Matching:** Matching teams ramp up in August, but a designated person will update the process every month to continue matching students.
- **Hand Matching:** About 60% of students are matched initially. The other 40% of students are looked at by hand, roughly 15% more students are found.
- **Matching Success:** Through these processes, Springfield has reached around 80% of students identified as low-income.
- **Population:** Springfield’s low-income population has a higher percentage of citizens, allowing focus on process, rather than outreach.

¹ Office of Community Services, U.S. Office of the Administration for Children and Families, Estimated State Median Income, by Household Size and by State, the District of Columbia and Puerto Rico, Federal Fiscal Year 2019, <https://www.acf.hhs.gov/ocs/resource/state-median-income-estimates-for-optional-use-in-fy-2018-and-mandatory-use-in-fy-2019>

² General Court of the Commonwealth of Massachusetts. S.238, 2019. Sections 5 and 22, <https://malegislature.gov/Bills/191/S2348>

³ General Court of the Commonwealth of Massachusetts. S.238, 2019, Section 5, <https://malegislature.gov/Bills/191/S2348>

⁴ Massachusetts Department of Elementary and Secondary Education. “Low-Income Student Calculation Study.” 2017. Pg. 5 <http://www.doe.mass.edu/bese/docs/fy2017/2017-02/item9-study.pdf>

⁵ Massachusetts Department of Elementary and Secondary Education. “Redefining Low-Income- A New Metric for K-12 Education.” <http://www.doe.mass.edu/infoservices/data/ed.html>

⁶ MassBudget Telephone Interview with Andrew O’Leary, Daniel Souza, Julie Mador, and Robert Tetreault, New Bedford Public Schools Administrators. September 9, 2019.

⁷ MassLegal Services. “What is the MA SNAP Gap?” Mass Law Reform Institute. 2019.

<https://www.masslegalservices.org/snap-gap>

⁸ Massachusetts Department of Elementary and Secondary Education. “Low-Income Student Calculation Study.” 2017. Pg. 11 <http://www.doe.mass.edu/bese/docs/fy2017/2017-02/item9-study.pdf>

⁹ U.S. Citizenship and Immigration Services. “Final Rule on Public Charge Ground of Inadmissibility.”

<https://www.uscis.gov/legal-resources/final-rule-public-charge-ground-inadmissibility>

¹⁰ Protecting Immigrant Families. “PIF Campaign: DHS Public Charge Finalization Field Webinar.” 2019. Slide 5

<https://protectingimmigrantfamilies.org/wp-content/uploads/2019/08/08.14.19-Public-Charge-Finalization-Webinar.pdf>

¹¹ Migrant Policy Institute. “Improving Education for Migrant- Background Students: A Transatlantic Comparison of School Funding.” 2016. Pg. 1

<https://www.migrationpolicy.org/research/improving-education-migrant-background-students-transatlantic-comparison-school-funding>

¹² California Department of Education. Local Control Funding Formula – “Unduplicated Pupils at Schools with Provision 2 and 3 or Community Eligibility Provision (CEP) Status.” <https://www.cde.ca.gov/fg/aa/lc/lcfaq.asp#PROV2and3>

¹³ Commonwealth of Massachusetts. “FY 2020 Final Budget.” See details for line item: 4000-0300.

<https://malegislature.gov/Budget/FY2020/FinalBudget>

¹⁴ California Department of Education. Local Control Funding Formula – “Free and Reduced-Price Meal (FRPM) Income Eligibility Under the LCFF.” <https://www.cde.ca.gov/fg/aa/lc/lcfaq.asp#PROV2and3>

¹⁵ California Department of Education. Local Control Funding Formula – “Unduplicated Pupils at Schools with Provision 2 and 3 or Community Eligibility Provision (CEP) Status.” <https://www.cde.ca.gov/fg/aa/lc/lcfaq.asp#PROV2and3>

¹⁶ United States Census Bureau. “Small Area Income and Poverty Estimates Program.” 2018.

<https://www.census.gov/programs-surveys/saipe/about.html>

¹⁷ MassBudget Telephone Interview with Andrew O’Leary, Daniel Souza, Julie Mador, and Robert Tetreault, New Bedford Public Schools Administrators. September 9, 2019.

¹⁸ MassBudget Telephone Interview with Nicole Rooney, Patrick Roach, and Timothy Gray, Springfield Public Schools Administrators. September 17, 2019.