



Fall Forum 2021  
Stimulus Funds and UGG, and You and Me, So Happy (Back) Together



## Student Data Counts and Other Challenges

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## Agenda

- What do we use all this data for, anyways?
- Census and Regulatory Data Challenges
- COVID-related concerns
- So, what now?

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## Title I Formulas

- Four formulas
  - *Basic Grants*
  - *Concentration Grants*
  - *Targeted Assistance Grants*
  - *Education Finance Incentive Grants*



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## Basis of the Title I Formulas

- Basic Grants
  - *Number/ share of poor children served*
- Concentration
  - *Number or percentage of poor children served*
- Targeted
  - *Percentage of students in poverty as a weighted factor*

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## Basis of the Title I Formulas

- EFIG
  - *Low-income student population*
  - *Per-pupil expenditures*
  - *Effort, as measured by State per pupil expenditures as compared to the State's per capita income*
  - *Equity, as measured by the degree to which education expenditures vary among school districts within the State*

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## Defining Key Terms

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- "Population"
    - *Ages 5-17*
    - *For per-pupil expenditure → based on average daily attendance (ADA)*
    - *For some States, on biannual "census" days*
  - "Poverty" = below the poverty level, as defined by the Census Bureau

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## ESEA Instructions for Counting Students

“(c) CHILDREN TO BE COUNTED.—

(1) *The number of children to be counted for purposes of this section is the aggregate of—*

(A) *the number of children aged 5 to 17, inclusive, in the school district of the local educational agency from families below the poverty level as determined under paragraph (2);...*

**AND**

(C) *the number of children aged 5 to 17, inclusive, in the school district of such agency from families above the poverty level as determined under paragraph (4).” (Sec. 1124(c))*

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## FRPL Data

- Free and reduced-price lunch data often used as a proxy for poverty when allocating between schools
- Sources of information include:
  - Individual student applications
  - “direct certification” of students through their or their families’ participation in programs with income-based eligibility
  - Data approximations through Community Eligibility Program (CEP)



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## Uses of FRPL Data in ESEA

- Title I formula for “special LEA” (census data not available): optional (ESEA sections 1124(c)(1)-(2), 1124A(a)(1), 1125(a)(1), and 1125A(c))
- Title I within-State allocations for small LEAs with approval from ED (ESEA sections 1124(a)(2)(B), 1124A(a)(4), 1125(d))
- Title I rank and serve (ESEA section 1113(a)(5)(a))
- Equitable services option for calculating income level (ESEA Section 1117(c)(1))
- Title I reporting on accountability by subgroup (ESEA section 1111(b)(2)(B)(xi), (c), and (h))
- Title II allocations for special LEAs (ESEA section 2102(a)(2)(B))
- RLIS option for alternate poverty data (ESEA section 5221(b)(1))(in phase-out)

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### Use of FRPL Data in ESEA: Example

"...local educational agency shall use the same measure of poverty, which measure shall be the number of children aged 5 through 17 in poverty counted in **the most recent census data** approved by the Secretary, **the number of children eligible for a free or reduced price lunch** under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.), **the number of children in families receiving assistance under the State program funded under part A of title IV of the Social Security Act**, or the number of children **eligible to receive medical assistance under the Medicaid Program**, or a **composite** of such indicators..." (Sec. 1113)

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### Other Sources of Poverty Data

- CRRSA EANS program: State allocations based on "the number of children aged 5 through 17 at or below 185 percent of poverty"
- CRRSA EANS program: schools submit "the number and percentage of students from low-income families enrolled by such non-public school in the 2019–2020 school year"
  - *ED guidance: can be based on*
    - Available free or reduced-priced lunch data
    - Scholarship or financial assistance data
    - E-Rate data
    - Representative sampling
    - Other data that aligns with State criteria/ threshold



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### Potential for Confusion: RLIS Example

- Initial authorization of RLIS in 2003 allowed substitution of "alternate poverty data" if Small Area Income and Poverty Estimates (Census SAIPE) data not available
- ED continues to accept alternate data until abruptly changing course in February 2020
  - *Changes program eligibility for LEAs*
- Congress pressured ED to grant one-year hold-harmless in April 2020
- Solution: 2021 appropriations bill clarifies criteria and offers hold harmless transition over 7-year period to LEAs that no longer qualify

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**How do you use FRPL data?**

**Do you use any other kinds of data?**

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**Census and Other Regulatory Data Challenges**

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**SNAP Data Challenges**

- SNAP work requirement anticipated to remove up to 500,000 students to lose direct certification
  - Overturned by Federal Court in March 2020
- Public charge regulations would weigh participation in means-tested programs deciding whether an immigrant is likely to become a "public charge" when deciding to provide visa/ permanent residency
  - *Explicitly excludes school meal programs (breakfast, lunch), school-based Medicaid, benefits received for family members, including U.S. citizen children*
  - *Multiple legal challenges, withdrawn from federal regulations in December 2020*

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## Census Bureau Data

- Usually updated annually
- Different sources of data may be updated at different times during year
- May be taken from a number of sources
  - Decennial Census
  - Annual American Community Survey
  - Data from income-based eligibility programs
    - TANF (SSA Title IV-A)
    - Medicaid
    - SNAP/WIC
- Census "areas" may not align with district boundaries
- Used in most poverty determinations



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## Decennial Census Data Issues

- Citizenship question
  - Administration said it wanted better citizenship data to help enforce Voting Rights Act
  - Supreme Court said no – too late in process, not a clear enough link
  - Likelihood of confusion among Census-takers, respondents
- Timing
  - Trump administration wants to end Census count early, citing pandemic (September 2020)
  - Federal judges overturn attempts to end count early, order it completed
- Pandemic
  - Difficult to find Census-takers
  - People are reluctant to open doors to Census-takers during last few months

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## Data Challenges: Chilling Effect

- Lingering concerns about deterrent effect of proposed regs/ rules on:
  - Filling out census form/ answering doors for census workers
  - Program participation (State/federal government-wide – anecdotal evidence)
  - Willingness to provide information
  - Will this lead to undercounting in areas with high immigrant and/or undocumented populations?



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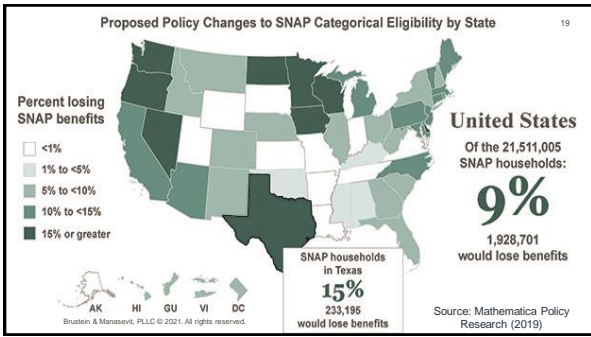
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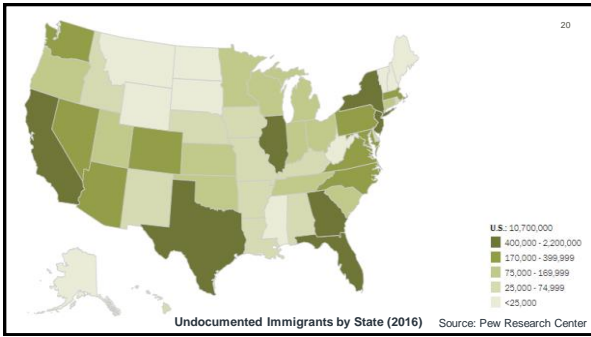
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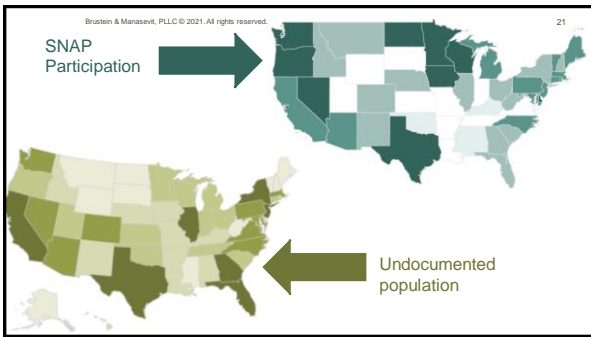
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# Why does this matter?

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## Why Does This Matter?

- Money
  - Federal programs are apportioned on the basis of relative shares of populations
  - More money flows to States with larger immigrant, low-income populations
- Power
  - Each State elects two Senators BUT House seats are apportioned by population
  - If Congressional seats were apportioned U.S. citizen populations alone:
    - California would lose six Congressional seats
    - New York, Florida, and Texas would each lose one seat
    - Indiana, Kentucky, Michigan, Mississippi, Ohio, Oklahoma, Pennsylvania, South Carolina and Wisconsin would each gain one seat
  - Electoral college votes based on total Congressional representation

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# COVID-Related Data Concerns

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## Lack of FRPL Data

- 2020-21, 2021-22 School Years: school operating on waiver that involves serving meals community-wide
  - Eligible meals are federally reimbursable
  - Does not require collecting FRPL applications
  - Not necessarily pulling new direct certification data
  - Most schools/districts not doing surveys
  - Stimulus programs allow schools and districts to pull from 2019-20 data
- Result: a lack of valid, reliable, and comparable federal poverty data!

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## Assessment Data

- States not required to conduct annual assessments in spring 2020 (ED provided nationwide waiver for 2019-20)
- ED asks Congress for waiver from NAEP requirements for 2020-21 school year (granted in CRRSA, plus additional funding)
  - Need to "postpone the administration of NAEP tests until the assessment will be able to produce useful results, likely in 2022"
- BUT ED says States can still conduct testing:
  - "States should implement their own assessments on schedule in spring 2021, given that they do not face the same constraints as NAEP and have ample time to plan for successful test administration tailored to their unique circumstances."

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## Assessment Data

- Short-term concerns: are we getting accurate data?
  - Worried about missing important data on learning loss
  - But are we assessing the right kids to get that data?
  - What other factors are impacting test scores?
- Medium-term concerns: is this data reliable?
  - E.g. can it be used to identify schools for improvement
  - Testing conditions vary
- Long-term concerns: is it a point of comparison?
  - Can we use it to measure growth going forward?

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## In other words...



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## So, What Now?



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## Assessments

- Expect full slate of assessments this year (2021-22)
  - *With likely return to identification in 2022-23 based on that testing data*
- Unclear what assessments will look like
  - *Will there be a rebound? What about ongoing distance learning/ quarantines?*

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## But that still leaves...

- No FRPL data!
  - Significant changes over two years in employment status, household status
  - Childcare issues persist
  - Significant differences between genders, ethnic groups, educational attainment
- ...differences not reflected in FRPL data from 2019-20!

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Share of 25- to 54-year-olds who are employed, 2007-2021. Recessions are shaded.



Source: Bureau of Labor Statistics, U.S. Department of Labor, data series LNS12300060.



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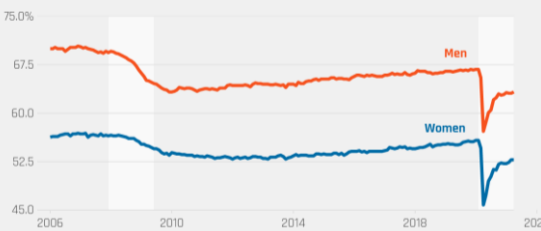
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Share of the U.S. population that is employed, by gender, 2007-2021. Recessions are shaded.



Source: Bureau of Labor Statistics, U.S. Department of Labor, data series LNS12300002 and LNS12300001



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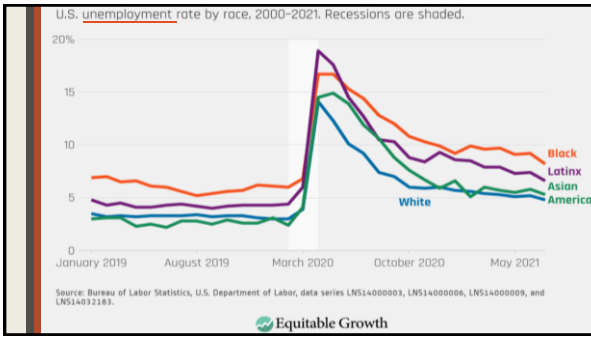
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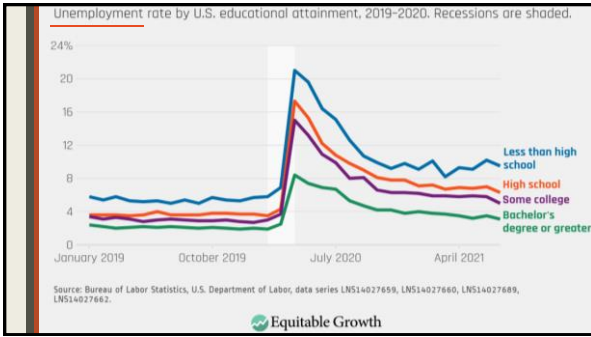
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### Data guidance from ED (January 2021)

- For Special LEAs (Title I eligibility and allocations, Title II allocations, RLIS eligibility)
  - Prefer to use NSLP data from 2020-21 to derive census poverty
  - If not available, SEA may use:
    - Poverty data other than NSLP data (e.g., Medicaid counts or other poverty data available to an SEA for State purposes);
    - "The best available NSLP data, which may be from SY 2019-2020"
    - NSLP data from SY 2020-2021 that may be accessible (e.g., counts of children identified through direct certification)
    - Data from a poverty survey conducted by the SEA or LEA that replicate NSLP or other poverty data

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## Data guidance from ED (January 2021)

- For small LEAs
  - Prefer to use NSLP data from 2020-21
  - If not available, SEA may seek ED approval to use:
    - The best available NSLP data, which may be from SY 2019-2020;
    - NSLP data from SY 2020-2021 that may be accessible (e.g., counts of children identified through direct certification); or
    - Data from a poverty survey conducted by the SEA or LEA that replicate NSLP or other poverty data.

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## Data guidance from ED (January 2021)

- Within-LEA Title I allocations (rank and serve)
  - Prefer to use NSLP data from 2020-21
  - If not available, LEA may use:
    - Medicaid or TANF data or a composite of data of these two sources from SY 2020-2021
    - The best available NSLP data, which may be from SY 2019-2020
    - NSLP data from SY 2020-2021 that may be accessible (e.g., counts of children identified through direct certification)
    - A composite of NSLP, Medicaid, and TANF data, and the best available FRPL data, which might include Medicaid, NSLP, or TANF counts from SY 2020-2021
    - Data from a poverty survey conducted by the SEA or LEA that replicate NSLP, Medicaid, or TANF data

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## Data guidance from ED (January 2021)

- Equitable Services
  - LEA may choose from the following data sources, in consultation with private schools:
    - The same measure of poverty used to count public school children
    - Comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable
    - Comparable poverty data from a different source
    - The application of the low-income percentage of each participating public school attendance area to the number of private school children who reside in that school attendance area; or
    - An equated measure
  - ED notes: this may mean relying on NSLP data!

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## Data guidance from ED (January 2021)

- Equitable Services (cont.)
  - *Reminder: LEA can make the determination every two years, so can use last year's data if it's the second year of a cycle*
    - E.g. use 2019-20 data for 2020-21 AND 2021-22
  - *For an LEA that would normally use 2020-21 data to determine proportional share for 2021-22, if NSLP data are not available, LEA may use data from 2019-20 instead in consultation with private school officials*

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## Data guidance from ED (January 2021)

- Reporting and Accountability
  - *Prefer to use NSLP data from 2020-21 to derive census poverty*
  - *If not available, SEA may use to identify "economically disadvantaged" students:*
    - Poverty data other than NSLP data
    - The best available NSLP data, which may be from SY 2019-2020
    - NSLP data from SY 2020-2021 that may be accessible (e.g., counts of children identified through direct certification)
    - Data from a poverty survey conducted by the SEA or LEA that replicate NSLP or other poverty data.

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## Average Daily Attendance Guidance

- From ED OESE, January 2021
- Offers States two options for 2019-20 school year:
  - *If State CANNOT determine accurate ADA during remote learning → count only up until date of school closure*
  - *If States CAN determine accurate count for remote learning → do*
    - For those using federal definition, use total aggregate days of attendance
      - Minus any "interruptions"
    - Otherwise use State definition
- Full count for 2020-21, 2021-22 school year, regardless of operational status!
  - *Note: this will mean a mismatch in the year of the "most recent available data" in some cases*

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## ED Accountability Guidance

- Starts from the baseline assumption that States will have 2020-21 assessment data, but not 2019-20
- No waivers (thus far), i.e. SEA meets requirements for accountability, school identification, and report cards based on data from the 2020-2021 school year
- SEA can ask for "State plan addendum" to shift timeline forward by one year for:
  - Identifying schools or
  - Meeting measurements of interim progress (MIPs) and long-term goals.

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## ED Accountability Guidance

- If State doesn't believe it can meet requirements with that flexibility, must submit an ESEA State plan amendment request
  - E.g.:
    - Use different methodology to calculate achievement indicator
    - Use a different indicator entirely
    - Adjust weighting of indicators
    - Use an earlier data year for comparison for some indicators (ELP) or omit a year (grad rate)
    - Submit a waiver of the calculation on this indicator

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## ED Accountability Guidance



- CSI and TSI Schools
  - Schools designated CSI, TSI, or ATSI in 2019-20 will maintain that status in 2020-21
  - SEA may not exit schools EXCEPT if identification based on graduation rate
  - SEA can shift timelines for identification forward by one year to account for lost data in CSI and ATSI (two-year cycles)
  - SEA must resume identification of TSI schools (one-year cycle)
    - But may request a waiver under Sec. 8401

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### Looking Forward

- For 2021-22 school year, used "best available data"
  - *We know no data is going to be "great" right now*
  - *In most cases, SEA has discretion*
- For 2022-23 school year, ED may need to issue guidance on how to deal with lack of FRPL data
  - *How would you want to ensure accuracy?*
  - *Would your preference change if same options exist as in January 2021 guidance?*
- May want to consider survey to:
  - *Check if 2019-20 data still representative*
  - *Conduct sampling*
  - *Adjust data set*

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### Parent Surveys

- Often used for:
  - *Community eligibility program*
  - *State formula programs*
- Commonly ask for:
  - *Family/household size*
  - *Student name*
  - *Income range*
- Disadvantages
  - *Administrative burden*
  - *Questions of accuracy / participation bias*



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# Long-term Changes?

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## Reconciliation Bill

- Would make significant changes to “Community Eligibility Program” (below are from November draft)
  - *Move threshold from 40% poverty to 25%*
  - *Increase “multiplier” from 1.6 to 2.5*
  - *Allow State-level participation*
    - In addition to school/ district-level participation, no eligibility threshold



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## What happens with CEP?

- No income or eligibility data is collected
  - *Universal free meals provided*
- Schools have the option of conducting a parent survey to collect that or similar data
- Most data based on “direct certification” from other programs
  - *SNAP, WIC, Medicaid, etc..*
- → No FRPL data as the default

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## Are you prepared for FRPL to go away?

- No guarantees, but:
  - *Time to examine what State mechanisms rely on FRPL data*
  - *Do you have an alternate data source you prefer?*
  - *How robust are your data-gathering/management tools?*

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## Questions:



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## Useful Links and Further Reading

- Department of Education, [Fact Sheet on NSLP Data Alternatives](#), January 4, 2021
- NEA, [Summary of REAP changes](#), updated January 2021
- National Center For Education Statistics, "[Allocating Grants for Title I](#)," January 2016
- Congressional Research Service, "[Allocation of Funds Under Title I-A of the Elementary and Secondary Education Act](#)," Updated September 17, 2018
- Congressional Research Service, "[Analysis of the Elementary and Secondary Education Act Title I-A Allocation Formulas: Factors, Design Elements, and Allocation Patterns](#)," Updated March 22, 2018

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