

## Recommendations for Alternative Proxy for Poverty

TO: William E. "Brit" Kirwan, Chair, The Blueprint for Maryland's Future Funding Formula Workgroup

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### The Problem

Public schools across the state are struggling to accurately count the number of students living in concentrated poverty. Many of these difficulties stem from recent federal actions aimed at discouraging families from enrolling in many of the social safety net programs (CHIP, SNAP) that Maryland uses to identify students living in poverty. Beyond changes to the Public Charge Rule, which discourage documented immigrants from taking advantage of social safety net programs, the federal government is also attempting to modify the way the federal poverty level is calculated, which will result in fewer families being identified as living in poverty, and therefore fewer families qualifying for those same programs.

For schools taking advantage of the Community Eligibility Provision of the federal Hunger Free Kids Act, the reliability of data obtained through Direct Certification (matching students to their families' enrollment in the aforementioned programs) is critical to ensure appropriate funding and services are available in schools which need them most. Data integrity is paramount and utilizing a multiplier for Direct Certification does not get at the root of the disparity and will likely widen the gap. We believe that a multiplier is a district-level solution to a school-level challenge. Our proposal is a more rigorous and accurate measure of individual family and school level poverty rates and should be adopted.

### Proposed Policy Solution

We urge the members of The Blueprint for Maryland's Future Funding Formula Workgroup to identify economically disadvantaged students through a combined approach model that would not duplicate families identified through two methods:

1. An expanded Direct Certification process
2. An annual alternative income declaration form

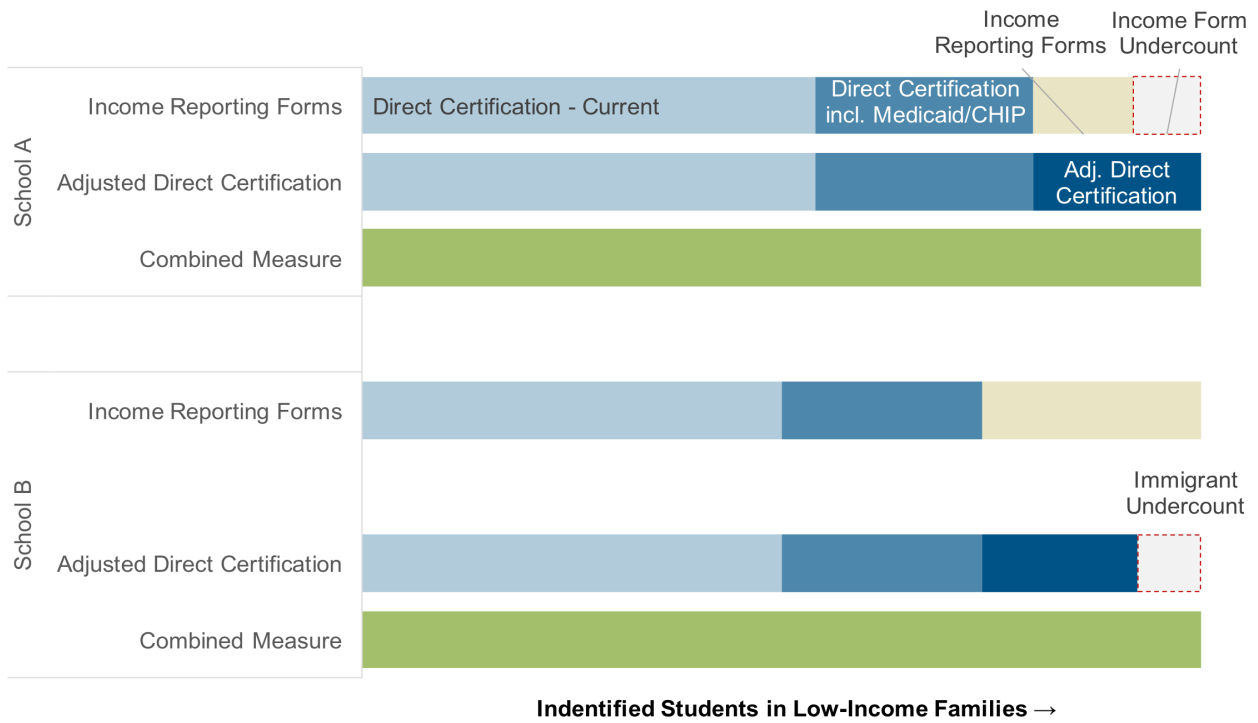
#### Other Considerations:

- The qualifying Direct Certification programs should be expanded to capture more families living in poverty by including those families who receive Medicaid or WIC, as well as working with local homeless services data systems to better identify students experiencing housing instability and/or homelessness.

- The Alternative Income Declaration form would be collected by schools and verified by the same standards currently used for official federal Free and Reduced Meal Applications.
- Suggestions and best practices should be gathered by the school community (teachers, parents, principals), state and district educational authorities on the best logistical practices for accurate and complete collection of Alternative Income Declaration Forms.

### Combined Approach Avoids Undercounting Students in Low-Income Families

Implementation of combined approach in two hypothetical schools



### Additional Context and Implications

Students from families with undocumented, mixed, and even legal residency status are being disproportionately impacted by this issue. Schools have seen their official poverty rates drop drastically from one school year to the next, though school-based staff note that these figures are in correct. In some cases, the number of students living in poverty who are enrolled at individual schools has increased while official poverty estimates have decreased. These shifts have caused schools serving high-need students to lose out on federal funding, Title 1 status, and even state supports like the new funding for Community Schools which were included in the Blueprint for Maryland’s Future legislation (2019).

These negative impacts are acute and far-reaching. Teachers who've chosen to teach at schools with Title 1 designation may lose out on student loan debt supports once their schools are inaccurately stripped on this designation. Class sizes may increase as staffing capacity decreases as budgets struggle to address loss of funding and ineligibility for federal and local grants due to unreliable poverty data. Families may no longer have access to federal Fresh Fruit and Vegetable Programs in schools. High school students who are United States citizens, including those experiencing housing instability, may lose out on post-secondary financial aid opportunities if they are unable to produce information certifying their family income status.

This inaccurate collection of data leads to significant reductions in state and federal funds, and loss of funding opportunities like those in the Commission on Innovation and Excellence's recommendations, particularly those addressing schools serving students who live in areas of concentrated poverty.

### **Empirical Support for the Proposed Policy Solution**

The above outlined solution is one that would cast a more complete net when collecting student data especially levels of poverty. It would put Maryland in line with precedent set by other states which have eliminated the FRPM form but maintained an alternative form. Currently, 21 of Maryland's 24 counties have mechanisms still in place to collect forms. This proposal is also generally supported by the reports already presented to the Commission over the past few years:

- "(T)he study team considers the continued use of free and reduced-price meals and the use of Direct Certification as being the best proxies for identifying economically disadvantaged students."<sup>1</sup>
- "The study team recommends that the number of social services used to identify low-income students be expanded to include children in households that receive Medicaid support or participate in the Children's Health Insurance program. This would help to capture a larger number of students who qualify for means-tested social services."<sup>2</sup>
- "The first alternative, which is the preferred approach, is to continue to use FRPM eligibility to identify students for compensatory education funding but use an alternative state-developed form for collecting FRPM eligibility information."<sup>3</sup>

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<sup>1</sup> Croninger, R., Rice, J. K., Checovich, L. June 30, 2015. [Evaluation of the Use of Free and Reduced-Price Meal Eligibility as a Proxy for Identifying Economically Disadvantaged Students. Alternative Measures and Recommendations](#)

<sup>2</sup> Ibid.

<sup>3</sup> Augenblick, Palaich & Associates. November 30, 2016. [Final Report of the Study of Adequacy of Funding for Education in Maryland](#)

Maryland stands at a crossroads for achieving equity in our school funding. If the recommendations of the Commission are fully funded, but this undercounting of our students is not fixed, we will face a widening of this inequality gap – one that we will not easily turn back from. We urge you to consider the proposed recommendations in your report to The Commission on Innovation and Excellence in Education.

For additional information, please contact Matt Quinlan, Public Policy Manager, Family League of Baltimore, at [mquinlan@familyleague.org](mailto:mquinlan@familyleague.org) or 410-236-54898.

Sincerely,

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