

## Your Question:

You inquired about which states use direct certification to determine low socio-economic status, examples of other possible ways of calculating low SES, and the pros and cons of those alternatives.

## Our Response:

The education community has historically relied heavily on free- and reduced-price meal eligibility data in both individual and aggregate form to identify socio-economically disadvantaged students, schools, areas, and populations. This information, which originates in the [National School Lunch Program](#) (NSLP) administered by the U.S. Department of Agriculture, is used by local education agencies (LEAs), state education agencies, and the U.S. Department of Education to target resources to schools with students and families in need of supplementary services. It is also used in other ways that have significant consequences for students, schools, and SEAs, including policymaking related to funding, service availability, program eligibility, accountability, and research.

However, while NSLP eligibility data may be appropriate for operating a meals program, it has been challenged by some in the education community as a measure of an individual's SES for three primary reasons:

1. NSLP eligibility data are being interpreted and used in a manner that is not intended by the collection;
2. access to NSLP eligibility data is severely limited within the education community; and
3. NSLP eligibility data are becoming less applicable as a proxy for individual economic need.

## Advantages and Disadvantages of Free- and Reduced-Price Lunch as a Measure of SES

According to [Improving the Measurement of Socioeconomic Status for the National Assessment of Educational Progress: A Theoretical Foundation](#), there are advantages to using NSLP eligibility as a way to measure SES, including inexpensive data collection costs, NSLP is easily understood by a variety of audiences, and NSLP eligibility is tied to federal definitions of poverty, which means maintenance or updating is handled automatically through updating of federal poverty guidelines. However, there are problems with using NSLP eligibility as the main measure of SES, including the following:

- **Narrow scope:** NSLP eligibility measures only one SES component, family income, and does not reflect parental educational attainment or occupational status.
- **Reliability/accuracy:** Due to the process of eligibility certification, NSLP eligibility may not be the most reliable measure of family income as approximately 20 percent of students either are not eligible but are deemed eligible or are eligible but are not recognized as such.

## **Additional Resources**

- ✓ [Student Eligibility for a Free Lunch as an SES Measure in Education Research](#), Michael Harwell and Brandon LeBeau, Educational Researcher, 2010
- ✓ [Beyond Free Lunch – Alternative Poverty Measures in Educational Research and Program Evaluation](#), Anja Kurki, Andrea Boyle, and Daniel K. Aladjem, American Institutes for Research, 2005
- ✓ [Exploring the Limitations of Measures of Students' Socioeconomic Status \(SES\)](#), Emily R. Dickinson and Jill L. Adelson, Practical Assessment, Research & Evaluation, May 2014
- ✓ [Poverty and Education: Finding the Way Forward](#), Richard J. Coley and Bruce Baker, Educational Testing Service, July 2013

- **Lack of nuance:** Because there are only three levels of NSLP eligibility, there are large within-category SES differences, particularly in the non-eligible category.
- **Blanket eligibility:** Because school-level and jurisdiction-level eligibility deems all students in a school or jurisdiction eligible for NSLP regardless of family income, this threatens the validity of NSLP eligibility as a measure of an individual student's family income.

### Direct Certification

Moreover, the [National School Lunch Program: Background, Trends, and Issues](#) found that direct certification, which is automatic certification for children in households participating in SNAP, TANF, or the Food Distribution Program on Indian reservations, has also reduced errors in eligibility and has been shown to increase participation by students eligible for a free school lunch.

### State Examples

While we are unaware of a resource that has identified which states use direct certification and for what purposes, we can provide examples from Every Student Succeeds Act state plans, programs, and statutes below.

The following states are using direct certification to determine SES as part of their individual ESSA state plans:

- [Tennessee](#) defines a “low-income” or “economically disadvantaged” student as someone who is directly certified to participate in state or federal assistance programs, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Head Start. Students who are identified as homeless, migrant, and runaway are also included in the direct certification calculation.
- [New Mexico](#) defines “economically disadvantaged” students as those who are eligible for free- and reduced-price lunch. Direct certification allows for student-level detailed data reported and stored on the New Mexico Public Education Department’s Student Teacher Accountability Reporting System to be matched with monthly New Mexico Human Services Department student benefit data.
- [Delaware](#) defines “low income” students as those who receive benefits through TANF or SNAP (jointly referred to as “direct certification.”)
- [Colorado](#) notes the Colorado Department of Education works in coordination with its Nutrition Unit to assure the participation of children and youth identified as homeless in federal, state, and local nutrition programs. Additionally, the CDE monitoring includes the direct certification process that LEAs use to identify participation of students who are identified as homeless.

The following state uses direct certification to determine SES as part of another program in their state:

- Indiana’s [Choice Scholarship Program](#) utilizes direct certification, which is a database compiled of students who utilize other state administered financial assistance programs, and legal foster child status as ways for Choice students to satisfy the income eligibility aspect of the application process.

### State Legislation

On Oct. 12, 2017, California enacted [SB138](#), which requires school districts with a high-poverty school or charter school to apply to operate a federal universal meal service provision that provides breakfast and lunch free of charge to all pupils at that school and requires LEAs participating in a federal school meal program to use income data from Medi-Cal programs to directly certify students eligible for free- or reduced-price school meals.

In Massachusetts, [S.246](#) and [S.285](#) were introduced last year to amend the calculation of economically disadvantaged students. S.246 and S.285 accompanied [S.2351](#), which authorizes a study of the calculation of economically disadvantaged students.

- Although not directly related to the bills previously mentioned, the following documents detail a Massachusetts study on low income student calculations and provide background information on an alternative measure to SES:
  - [Low-Income Student Calculation Study](#), prepared by the Massachusetts Department of Elementary and Secondary Education; and
  - [A Changing Metric: Low Income vs. Economically Disadvantaged](#), Massachusetts Department of Elementary and Secondary Education presentation.

### Alternative Measures

The [Forum Guide to Alternative Measures of Socioeconomic Status in Education Data Systems](#) provides examples of alternatives to free- and reduced-price meal eligibility data as a proxy for individual student and family SES. SES data are needed to identify individuals who are eligible to receive benefits; allocate resources for related programs and services; and make meaningful distinctions in accountability systems and other reporting that influence perceptions about the effectiveness of public schools, programs, and services. The following measures, often in combination, have been used as components of or proxies for SES in education organizations:

- Eligibility for other means-tested program.
- Household-provided information.
- Student and family categorical status, family and household income.
- Highest level of education completed by resident parent or guardian, occupation of resident parent or guardian, neighborhood SES and school district poverty estimate.

Additionally, the Guide explains the context of SES data collection and use in administrative records systems in the education community; describes the benefits, challenges, and limitations of plausible SES alternatives; emphasizes standard definitions and calculations for SES alternatives to encourage comparability; and recommends good practices for adopting and implementing new SES elements in education agencies and data systems.