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## Commentary: Community Eligibility Doesn't Lead to Inferior Counts of Low-Income Students

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As the school year gets started, school districts are beginning their annual count of their low-income students. The districts need to identify low-income students and know each school's low-income share to target resources and services to schools and individual students. Low-income schools might receive additional funding, staff, or materials, while students from low-income families might get extra academic support or waivers from fees for extra-curricular activities.

Until recently, school districts typically have identified low-income students using applications for free and reduced-price school meals. Now, with the nationwide implementation of [community eligibility](#), a new way to deliver meals in high-poverty schools, the method for assessing schools' poverty level is changing — but not for the worse, contrary to some [news reports](#).

Here's how the traditional approach works. At the start of every school year, schools determine which students automatically qualify for free meals due to their participation in a means-tested program, such as SNAP (formerly food stamps). After this data match, the remaining families may choose to complete an application for free or reduced-price school meals. Students who meet the income requirement qualify for the free or reduced-price meals. These two groups of children are considered low-income (or “economically disadvantaged,” as the federal Title I program that provides funding for disadvantaged students' education terms them).

Approval to receive free or reduced-price meals is a reasonable but imperfect measure of low-income students: not every low-income family fills out the form at the beginning of the school year; the program doesn't reach many near-poor families whose income is between 130 and 185 percent of the federal poverty line, which would qualify them for reduced-price meals; and some families' incomes drop after school districts process meal applications. Nevertheless, it's a decent measure. Districts have grown accustomed to its imperfections and have accepted the data as the best school-level poverty measure.

This process is changing, however, for the more than 14,000 schools that have adopted community eligibility. Community eligibility allows high-poverty schools to serve all students breakfast and lunch at no charge. The provision increases participation in the meals program, which is associated with better diets, attendance, and behavior, while helping to ensure that children are

ready to learn. It also enables schools to devote fewer resources to paperwork and more to improving meals or to other educational priorities.

One of the key administrative benefits of implementing community eligibility is that participating schools don't use school meal applications. Instead, schools' ability to adopt community eligibility depends on their share of students identified as being at risk of hunger by another program that automatically qualifies children for free school meals, such as SNAP or Temporary Assistance for Needy Families (TANF) cash assistance. Children who are homeless, migrant, runaway, in foster care, or in Head Start also automatically qualify. Students who fall into these categories are known as Identified Students, and a school can adopt community eligibility if its share of Identified Students is 40 percent or higher.

While community eligibility uses extremely reliable data from other programs to count its Identified Students, those students represent only a subset of the students who would qualify for free or reduced-price school meals if schools collected applications.

Some news reports have misstated how the absence of school meal application data affects these counts, claiming that by adopting community eligibility, a school's share of low-income students could immediately rise from, say, 40 percent to 100 percent. But this claim is false. Although all students eat at no charge, all students are *not* counted as low income when the U.S. Department of Education collects these data.

Each year schools report their number of low-income students to the Education Department's National Center for Education Statistics (NCES), which publishes these data. Currently, NCES has told community eligibility schools to continue to report the same percentage of students who qualified for free or reduced-price meals before they implemented community eligibility and apply that percentage to the school's current enrollment. Specifically, NCES has provided schools with [these instructions](#) for counting low-income students:

Report current headcounts of free and reduced-price students, when possible. If the data are not available due to schools implementing the [Community Eligibility Provision], estimate the count of students by multiplying current year membership [school enrollment] by the percentage of eligible students in the most recent year for which the school collected that information.

While this method has shortcomings — it doesn't pick up on how a school's poverty level changes over time — it won't show a jump in a school's share of low-income students from 40 percent to 100 percent, because a school's share of low-income students is essentially frozen when it implements community eligibility.

But the absence of school meal applications does mean that schools need a different data source to count their low-income students for the purposes of allocating resources. They can get that data from another means-tested program, like Medicaid, or income data the school district collects outside the school meals program. Alternative data sources aren't inferior to school meals applications, they're simply different, and have other strengths and weaknesses.

Implementing community eligibility has many clear benefits for students and schools, but it would be counterproductive if it caused them to miss out on other resources or benefits. NCES' current

approach is imperfect — and NCES has [solicited public comments](#) on how to proceed — but it has some advantages: it doesn't create an additional administrative burden for schools and prevents sudden changes in the share of students counted as low income. Going from one imperfect measure to another may seem inefficient, but community eligibility's benefits are well worth the consideration.