

Raising Your 2004, Year 8 E-rate Discounts ~ 2004-2005 National School Lunch Eligibility Guidelines Posted ~

As you know, E-rate discounts are determined by two factors:

- whether your district is located in a rural or urban county,
- and what percentage of your students' families qualify for free or reduced lunches.

If your school doesn't participate in the NSLP program, or you feel that your NSLP enrollment does not reflect the true poverty of the students in a particular school, there are official mechanisms established by the FCC in which a school can determine true eligibility, regardless of NSLP enrollment or school participation in the program.

I encourage all schools to attempt to reach their true eligibility percentage, rather than simply rely on enrollment figures. Some schools, particularly high schools, have used surveys, sibling matches, or other income-related programs to determine which students' families have income guidelines that meet or exceed the NSLP thresholds -- with great success.

All of those methods are discussed below. Please note that if you use any other information (surveys, etc) besides what is reported to TEA, the SLD will ask you for additional information during your PIA review. Normally, they request a copy of the survey, the number that were mailed and number returned, and sometimes a statement from the principal, food service director or superintendent requesting confirmation that the survey was legitimate. It's not a high hurdle to leap, but be prepared for it and keep careful records.

The 2004-2005 NSLP Income Guidelines have been released by US Department of Agriculture and can be found at: <http://www.fns.usda.gov/cnd/governance/notices/iegs/IEGs04-05.pdf>. Be patient...sometimes it takes a while for this .pdf to appear.

The columns you should refer to are the Household Size, and the five columns under Reduced Price Meals - 185%. The reason is because the income requirements aren't as stringent for reduced price meals as they are for free meals, so it is more advantageous to use the reduced meals income levels. Also, be careful to just use the top of the chart, as the second and third sections are for Alaska and Hawaii only.

CONDUCTING AN INCOME SURVEY -- If you choose to do a survey, the following guidelines apply:

- The survey must be sent to all families whose children attend the school (survey doesn't have to be sent to the whole district).
- The survey must attain a return rate of at least 50%. If a school has sent a questionnaire to all of its families, and if it receives a return rate of at least 50 percent of those questionnaires, it may use that data to project the percentage of eligibility for E-rate purposes for all students in the school. For example, a school with 100 students sent a questionnaire to the 100 homes of those students, and 75 of those families returned the questionnaire. The school finds that the incomes of 25 of those 75 families are at or below the IEG for NSLP. Consequently, 33 percent of the students from those families are eligible for E-rate purposes. The school may then project from that sample to conclude that 33 percent of the total enrollment, or 33 of the 100 students in the school, are eligible for E-rate purposes.
If a survey is sent, and the school does not receive a 50% return rate, but finds additional students that are eligible for NSLP but aren't enrolled, they can count those students in their discount calculation. For example, if a school has 100 students, and 33 are enrolled in the NSLP, and the school identifies an additional 10 students through a survey, they can now say that 43 students are eligible for the NSLP.
- The survey must, at a minimum, contain the following information:
 - Address of family
 - Grade level of each child
 - Size of the family
 - Income level of the parents

The survey must assure confidentiality. (The names of the families are not required.)

We've found the easiest way to construct the survey is to write a cover letter explaining what the E-rate is, and the potential financial and technological benefits the school will gain if a significant number of surveys are returned. Then attach a second sheet containing the actual survey. Instead of asking for the exact income of the family, it's easiest to list the number of members of the family in one column, and then the income guidelines for that family size. Then just ask them to circle the number of people in their family, and indicate Yes or No as to whether their income meets or exceeds that amount. If the answer is No, then all of the students in that family can be counted as eligible for the NSLP.

Using volunteers to make calls encouraging families to return of surveys has worked well in many districts.

FINDING ELIGIBLE STUDENTS THROUGH OTHER PROGRAMS

There are several other programs that have income guidelines that meet or exceed the income eligibility guidelines for the National School Lunch Program. If you know a student participates in one or more of the programs listed below, you know that that family can be added to your NSLP eligibility data set for E-rate purposes.

The programs are:

- Medicaid
- Food stamps
- Supplementary Security Income (SSI)
- Federal public housing assistance or Section 8 (a federal housing assistance program administered by the Department of Housing and Urban Development)
- Low Income Home Energy Assistance Program
- Participation in Temporary Assistance for Needy Families (TANF) is an acceptable alternative measure of poverty ONLY IF the family income of participants is at or below the IEG for NSLP.

Similarly, participation in need-based tuition assistance programs is acceptable if the family income of participants is at or below the IEG for NSLP.

I've attached a sample copy for you so that you can edit these documents and use them to reflect information for your schools, if you wish. They are Word documents.

USING EXISTING SOURCES

Schools may also use existing sources of data which measure levels of poverty, such as surveys that may have been collected for other programs, such as need-based tuition assistance programs. However, these measures are acceptable for E-rate purposes only if the family income of participants is at or below the IEG for NSLP.

CONDUCTING A SIBLING MATCH

The siblings of a student in a school that has established that the student's family income is at or below the IEG for NSLP may also be counted as eligible for E-rate purposes by the respective schools the siblings attend. For example, an elementary school has established, through a survey, that a student's family income is at or below the IEG for NSLP. That student has a brother and a sister who attend the local high school. The high school may use the status of the elementary school sibling to count his high school siblings as eligible for E-rate purposes, without collecting its own data on that family.

UNACCEPTABLE ALTERNATIVE DISCOUNT MECHANISMS

The following alternative measures of poverty are NOT acceptable for determining E-rate discounts. They rely on projections rather than on the collection of actual data:

- Feeder school method. This method projects the number of low-income students in a middle or high school based on the average poverty rate of the elementary school(s) which "feeds" students to the middle or high school. Sibling matches, however, are OK.
- Proportional method. This method projects the number of low-income students in a school using an estimate of local poverty.
- Extrapolation from non-random samples. This method uses a non-random sample of students chosen to derive the percentage of poverty in a school, such as those families personally know by the principal ("Principal's method") or the families of students who apply for financial aid (a non-random sample).
- Title 1 eligibility. This method uses eligibility for Title 1 funds as the criterion for estimating the level of poverty in a particular school. Some measures of poverty eligible under Title 1 are indirect estimates of poverty, and do not necessarily equate to the measure of poverty for E-rate, namely eligibility for NSLP.

As always, if you have any questions about conducting a survey or raising your E-rate discounts please contact me.