To: Superintendents Charter School Leaders and PIOs

From: Karl Pond, Director, Data, Research and Reporting, NCDPI

RE: Definition and Collection of Economically Disadvantaged Status

Dear Education Leadership,

The guidance outlined below addresses the concerns voiced by CEP and NSLP Non-Participating Charter Schools pertaining to the under reporting of students identified as Economically Disadvantaged. We believe that this guidance will provide CEP and Non-Participating Charter Schools the ability to more accurately report students identified as Economically Disadvantaged.

We ask that you share this information with the person within you PSU responsible for reporting this specific data to NCDPI.

## Background:

With the advent of the Community Eligibility Provision (CEP), Economically Disadvantaged (ED) can no longer be defined using only data generated from the National School Lunch Program (NSLP) which reflects students who are eligible for Free or Reduced Price meals at school (FRL). The use of CEP data would result in 100% of a public school unit's (PSU) students being identified as ED, regardless of individual classification. When sub-category reporting is required, individual level data is integral to reporting across programs.

PSUs that participate in the NSLP and are CEP qualified or those charter schools that do not participate in the NSLP have not had the ability to report data other than through Direct Certification and Categorially Eligible status for the application of the Economically Disadvantaged status.

## Changes:

Beginning with the 2021–22 school year, the criteria for identifying Economically Disadvantaged Student (EDS) status has been updated by the United State Department of Education. Federal guidance through the EdFacts data collection and the Common Education Data Standards define Economically Disadvantaged Status as follows:

**EdFacts**: Economically Disadvantaged Status: An indication that students meet the state criteria for classification as economically disadvantaged.

**Common Education Data Standards**: Economic Disadvantage Status: An indication that the student met the State criteria for classification as having an economic disadvantage.

**Economically Disadvantage Status Definition:** 

The North Carolina Department of Public Instruction is further defining Economically Disadvantaged Status as:

Any student identified by a PSU, meeting the criteria of Directly Certified, Categorically Eligible, or a method consistent with State or Federal guidance for financial assistance regardless of participation or eligibility in the National School Lunch Program.

The process for reporting eligibility in the NSLP for all Non-CEP and NSLP participating schools the guidance for reporting NSLP Eligibility by student does not change.

## Guidance:

This guidance is specific to Economically Disadvantaged Status only.

The following guidance applies only to the following scenarios:

- 1) CEP Schools and LEAs,
- 2) Non-participating NSLP schools, and
- 3) Non-CEP and NSLP participating schools that have the ability to identify a student as Economically Disadvantaged who may not be identified as part of the NSLP.

NCDPI will continue to use authoritative sources for Direct Certification and Categorically Eligible data to identify Economically Disadvantage Status. In addition to these sources, PSUs will provide additional eligible students from a collection of information consistent with State or Federal guidance for financial assistance.

For all schools, a local process may be developed to collect information for the purpose of identifying students meeting the criteria for Economically Disadvantaged Status. For example, for schools participating in the NSLP, approved household applications is one method of assigning the Economically Disadvantaged Status.

## Definitions:

Direct Certification--A process used to certify eligible children for free meals at school without the need for household applications.

Categorical Eligibility--Automatic eligibility for free meals at school due to a child's documented status in one of the following "other source" conditions:

- Homeless, runaway, or migratory child;
- Foster child; or

 Child enrolled in a Federally-funded Head Start or comparable State-funded Head Start or prekindergarten program.

The NSLP Household Application is one mechanism households may use to apply for free or reducedprice meal benefits in the Federally assisted School Nutrition Programs. Data Collection:

All identified students must be qualified using the State defined process. Each PSU will be required to maintain and produce the criteria and documentation for any Economically Disadvantaged determination made outside of Direct Certification and Categorically Eligible determinations upon request.

Data collection and submission processes are supported by PSU Testing/Accountability Coordinators. Only those PSU Testing/Accountability Coordinators listed on the Memorandum of Agreement between the School Nutrition Division and Accountability Services Division may have access to data provided from the National School Lunch Program.

Data collection and submission processes will now contain both students who are eligible for free or reduced price meals in the NSLP and those identified as Economically Disadvantaged by the PSU using an approved alternate method.

Updates to the Economically Disadvantaged Student data collection processes and procedures will include new coding. The additional category, PSU Identified EDS – Non-NSLP Participating, for submission of PSU identified Economically Disadvantaged students will be added. This code reflects students identified by a means other than Direct Certification, Categorically Eligible and household applications from the National School Lunch Program.

PSUs will provide all data to the Testing/Accountability Coordinators for submission to NCDPI in a single file on a monthly basis. Failure to provide the data requested may result in lower EDS counts for both the National School Lunch Program and Economically Disadvantaged numbers.

Updated data collection guidance will be provided to Testing/Accountability Coordinators and supported by the Accountability Services Division regional staff.

A webinar to present this information and discuss the data collection will be scheduled in the coming days. The first collection of EDS data in September do not require full implementation the PSU Identified EDS—Non-NSLP Participating designations as we understand it will take time to develop a system locally and collect these data.

Please provide any feedback or questions to me at karl.pond@dpi.nc.gov or 984-236-2227.

Thank you