

ARP EANS

Independent School Low-Income Data Form

Purpose

The ARP (American Rescue Plan) EANS (Emergency Assistance to Non-public Schools) program provides services or assistance to eligible independent schools to address educational disruptions caused by COVID-19. Under ARP EANS, the VT Agency of Education (AOE) is directed to provide services or assistance to independent schools that enroll a significant percentage of students from low-income families and are most impacted by the novel Coronavirus Disease 2019 (COVID-19) emergency.

Schools are required to use this document to capture and report student low-income data. The heads of eligible independent schools may fill out the appropriate section(s) of this form to confirm required student low-income data under ARP EANS. All sections are not required. Once you have completed this form, upload it into the [ARP EANS Application webform](#). Please email aoe.geereans@vermont.gov with questions about the ARP EANS program or the application webform.

Reporting Requirements

An Independent school with approved applications should be aware that specific requirements around reporting are still forthcoming from the US Department of Education and that they will be required to comply with any reporting requests and deadlines that result from additional federal requirements. In addition, AOE would like independent schools to be aware that they may be subject to strict reporting deadlines, particularly around the end of the performance period, to meet federal reporting requirements. AOE will communicate any additional information as it is received. Schools must keep low-income documentation on file and available upon request to the Agency of Education.

Low Income Student Data- Defined

Source: United States Department of Education Non-Regulatory Guidance, March 19, 2021

The US Department of Education encourages States to “allow for the use of existing, generally available poverty data to enable reasonable estimates of a school’s low-income status rather than requiring a new data collection.

A State Education Association (SEA) may permit data from multiple sources, within the State and even within a non-public school, provided the poverty threshold is the same across schools.

Whatever the data source, an SEA must ensure that it does not require a non-public school to provide personally identifiable information about individual students or their families. To the extent a non-public school has these data available, the following data sources are recommended:

- available free or reduced-priced lunch data,

Contact Information:

If you have questions about this document or would like additional information, please contact: The EANS Program Team at aoe.geereans@vermont.gov.

- scholarship or financial assistance data that identify students whose family income does not exceed 185% of the 2020 Federal poverty guidelines,
- E-Rate data, or
- Other relevant data, such as data that the non-public school has provided to the State for purposes of State or local programs that identify students whose family income does not exceed 185 percent of the 2020 Federal poverty guidelines.”

Instructions

Heads of eligible independent schools may fill out the appropriate section(s) of this form to confirm required student low-income data under GEER EANS support program. All sections are not required.

Option 1 - Student Scholarship, Tuition Assistance, Financial Aid, and Parent Low-Income Survey Forms

Heads of school must provide verification that each eligible student’s gross household income does not exceed 185% of the 2020 Federal Poverty Level (FPL) guidelines. The 2020 Federal gross household income allowance, per number of family members, has been provided as a reference. Please include non-identifying student information for each eligible student’s household income in the chart below. If necessary, you may upload additional documents/spreadsheets to include each student receiving a scholarship or tuition assistance to ensure federal poverty level eligibility has been met. An example has been provided. *Please note FPL student list numbers are for enumerating separate, household income eligibility, and must not be construed as an actual student number.*

Heads of school must also submit copies of:

1. Parent surveys
2. Scholarship forms
3. Tuition assistance forms with this verification document

2020 Poverty Guidelines

Persons in family/household	Poverty guideline
1	\$12,760
2	\$17,240
3	\$21,720
4	\$26,200 Additional household members increase by 2020 FPL per person allowance of \$4,480

Sample Student FPL Eligibility Worksheet

Student	Total Number of People in Household	Total Gross Household Income (including child support, alimony, unemployment, Social Security, SSI and Medicaid)	Gross household FPL calculation: Total Gross Household Income divided by 2020 poverty guideline x100.* *The result must be less than 185%)
Example: Student A	4	\$37,000.00	$37,000.00 \div 26200 \times 100 = 141.22\%$
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Option 2 - Medicaid Eligible Student Data

Total School Enrollment	
Number of students eligible to receive Medicaid benefits as of March 2020	

Please attach/submit a copy of Medicaid eligibility documentation *for each* student. Documentation *must not* include any student identification information. For publicly placed independent school students, heads of school may be required to contact placing LEA to obtain official documentation to verify Medicaid eligible student data.

Option 3 - Free & Reduced Lunch Student Data for Non-participating Independent Schools

Verification of student low income using free and reduced lunch (FRL) programming must be based on 2020 FPL guidelines. COVID-era free and reduced lunch support programs, accessible to all enrolled students, **does not** meet the ARP EANS eligibility threshold. **Heads of school are required to provide the Agency of Education with a copy of each student’s FRL application as verification of eligibility.** Student identification information **must be** redacted from FRL applications prior to submission.

Total School Enrollment	
Number of students participating in FRL	

Student Low-Income Reporting Requirements, Assurances & Signatures

Reporting

Student Enrollment Data and Allocations Section 312(d)(3)(C) of the CRRSA requires AOE to prioritize services or assistance to independent schools that enroll low-income students. Accordingly, AOE requires that the school only report information on the school’s K-12 population; do not include the preschool population. Such data must not include personally identifiable information about students or their families.