# Supplemental Low-Income Data Collection

### Background

Under the Student Opportunity Act (SOA), the Department of Elementary and Secondary Education is required to identify eligible students up to 185% of the Federal Poverty Level (FPL) for the purpose of determining Chapter 70 aid and charter school tuitions. In response to this requirement, the Department has augmented its match with state databases for public assistance programs and created the Supplemental Low-Income Data Collection to give school districts and charter schools the opportunity to claim the relatively small number of students who qualify as low income under the 185% FPL standard, but who are not currently being identified through our match.

School districts and charter schools are not required to participate in the Supplemental Low-Income Data Collection. Those that do are required to collect Supplemental Low-Income Data Collection Forms along with supporting documentation from the families of students who may not be identified as low income through the match with state databases. Once school districts and charter schools collect the required documentation from families, they can claim unmatched students that qualify as low income under the 185% FPL standard on their October SIMS submissions under SIMS data element DOE056, Supplemental Low-Income Indicator. The Department will verify the documentation for each student claimed through on-site reviews prior to release of the governor’s budget during each budget development cycle.

The purpose of this FAQ is to answer common questions to guide school districts and charter schools in their administration of this data collection.

### Frequently asked questions (Updated as of August 14, 2023)

1. **[Updated 8/14/2023] How will the Department designate a student enrolled as of October 1, 2023 as low income for the purposes of Chapter 70 aid and charter school tuitions?**

The student must have been designated as low income during the 2022–23 school year *or* meet one of the following criteria:
2. identified as participating in state public assistance programs, including the Supplemental Nutrition Assistance Program, Transitional Aid to Families with Dependent Children, MassHealth, and foster care;
3. certified as low income through the supplemental data collection process; or
4. reported as homeless in the Homeless Students application for the McKinney-Vento Homeless Education Assistance program.
5. **How are students matched? How often does the Department conduct these matches?**

Following each SIMS data collection cycle, the Department works with the Executive Office of Health and Human Services to identify students who are participating in public assistance programs and meet household income eligibility criteria, where applicable. All students in foster care are automatically included as matches.

For the purposes of state aid and charter tuition, students enrolled as of October 1 are designated as low income if they match during that SIMS cycle or any of the previous three SIMS cycles (October 1, March 1, and End of Year).

1. **[Updated 8/14/2023] How can we access our list of matched students?**

Users must have the “SIMS data” security role to access the student match file in the Department’s [Security Portal](https://gateway.edu.state.ma.us/). The district or charter school’s directory administrator can assign this role. District and charter schools will each receive their own match file in the SIMS File Exchange drop box.

The file indicates whether students were matched during each of the last three SIMS cycles and then assigns a summary designation of “Yes” if they have at least one match. A student marked as “No” (not a match) and returning to the district in October 2023 is eligible to be claimed as low income through the supplemental data collection if the district collects and maintains documentation required under the supplemental data collection process to demonstrate the student’s low-income status.

Please note that the match file includes all students reported in SIMS, including students who transferred to another district or graduated.

Districts and charter schools should combine this data with local data to filter out students who are not expected to return to the district.

1. **How can we claim a student as low income who is not identified as a match in the student match file?**For students returning to or newly enrolling by October 1, the district or charter school should work with families to complete the Department’s supplemental data collection form. The form asks families to report their household income and provide acceptable supporting documentation.

The forms are available in the Security Portal in the SIMS File Exchange drop box. The district or charter school should customize the form by using their own letterhead and inserting the district or charter school’s name and point of contact information in the places provided on the form, but the text in the form and the required documentation cannot be changed.

The district or charter school must collect signed forms with supporting documentation and also certify the forms before reporting any students as low income to the Department. During the October 1 SIMS collection, the district or charter school should report the student as low income in SIMS element DOE056 and maintain the supplemental form and supporting documents. These supplemental identifications will be subject to audit by the Department.

1. **If we report students as low income on SIMS element DOE019, will that student automatically count as low income?**No, the Department no longer uses data from SIMS element DOE019 (the legacy low-income data element). For any student certified through the supplemental process, this data must be reported in the new SIMS element DOE056.
2. **What forms of documentation are acceptable for income verification?**As stated on the supplemental collection form, the following are acceptable forms of documentation for income verification. In some cases, more than one document will be necessary to support the reported income.
* A paycheck stub or pay envelope that shows the amount and how often the pay is received; letter from employer stating gross wages and how often you are paid; or, if self-employed, business or farming papers, such as ledger or tax books.
* A social Security retirement benefit letter, statement of benefits received, or pension award notice.
* A notice of eligibility from state employment security office, check stub, or letter from the worker’s compensation’s office.
* A benefits letter from the Massachusetts Department of Transitional Assistance for the Supplemental Nutrition Assistance Program (SNAP) or Transitional Aid to Families with Dependent Children (TAFDC), or the Executive Office of Health and Human Services for MassHealth.
* A court decree, agreement, or copies of checks received.
* A letter or rental contract showing that housing is part of the Military Privatized Housing Initiative.
* For other income sources (such as rental income), information that shows the amount of income received, how often it is received, and the date received.
* If the household has no source of income, a brief note explaining how the family provides food, clothing, and housing for the household, and when the family expects an income.
1. **Are we required to participate in this supplemental collection?**

No, districts and charter schools are not required to participate in the supplemental process.

1. **Can we require that families complete this supplemental form?**No, this is a voluntary process for families. No family can be required to participate in this supplemental collection.

1. **Are we allowed to use this form to verify income for other local purposes, such as athletic program fee waivers?**This form is for the supplemental low-income data collection, though it can also be used for other local purposes, such as athletic fee waivers.
2. **Can we use our own alternative income verification forms (such as those for local fee waivers) for this supplemental process?**No, the supplemental form is the only acceptable form to use to certify household income through this collection.
3. **Can we use school food service funds to cover the costs of administering income verification for the supplemental collection?**No, all costs associated with distributing, collecting, and reviewing the supplemental forms must be paid for with funds outside of the school food service account.
4. **[Updated 5/27/2022] What if a family is not able to provide adequate supporting documentation?**If a family is not able to provide adequate documentation, then a *community* *contact* (formerly *collateral contact)* must provide written evidence to support the family’s household annual income reported on the supplemental form.

For the purposes of this supplemental low-income data collection, a community contact is a person outside of the household who is knowledgeable about the household’s circumstances and can confirm a household’s income level. This contact cannot be an employee of the student’s district/charter school or the city or town where the student lives. The contact also cannot be any individual receiving payments from the district, charter school, or municipality to manage or administer the income verification process through a contract or other means. Community contacts include employers, social service agencies (not including city or town departments), migrant workers’ agencies, and religious or civic organizations. Community contacts must attest that their income verification statements are accurate and truthful and sign the supplemental form.

1. **What is the definition of family used for this supplemental process?**This supplemental process relies on the same definition used for the federal child nutrition programs. Specifically, a family is “a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit” [[7 CFR 245.2 (Code of Federal Regulations)](https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-245/section-245.2)]. Therefore, there may be instances where more than one family shares the same housing but live as separate economic units. In those cases, each family should complete a separate form based on its gross income.
2. **Can students over age 18 complete and sign the form on their own behalf?**

Yes, provided that they provide all sources of household income, not just income they earn on their own.

1. **[Updated 8/14/2023] How can we identify homeless students as low income?**The Department will automatically designate as low income any student who is reported as homeless in the Homeless Students application for the McKinney-Vento Homeless Education Assistance program. Consistent with the overall low-income matching process, students will be considered low income if their district or charter school has identified them as homeless as of October 1, 2023 or during the 2022–23 school year.

Districts and charter schools will not need to complete the supplemental process for homeless students.

1. **[Updated 7/5/2022] Is this supplemental form available in any languages other than English?**

Yes, the form is also available in Chinese, Haitian Creole, Portuguese, Spanish, and Vietnamese. The translated forms are available on the [Supplemental Low-Income Data Collection](https://www.doe.mass.edu/finance/chapter70/data-collection.html) page. Districts and charter schools can have these forms translated into other languages, as well.
2. **[Updated 5/27/2022] Can the supplemental form be signed electronically?**Yes, districts and charter schools can collect the signatures required on the form electronically using an e-signature application. Please note that districts and charter schools must print and provide paper copies of the signed form and supporting documentation to support the audit process.
3. **If we identify a student as a match through the Virtual Gateway who is not in the match file provided by the Department, do we have to collect a supplemental form for that student to count as low income**?

*9/28/2021: Replaced by new items 25 and 26 below*

1. **How does the supplemental collection differ from the process we use to identify students as eligible for free or reduced-price lunches?**

While this supplemental collection follows a similar process for income verification as the school lunch program, one major difference is that this collection requires families to provide supporting documents at the time that they claim their household incomes on the forms. In contrast, for school nutrition programs, families are required to provide such documents only if their applications are selected for audit through the USDA-required income verification process (i.e., after submitting their applications).

Districts and charter schools must administer the supplemental collection as a separate and distinct activity unrelated to the school meal household application process*.* The supplemental collection requires income verification before claiming students as low income in the October 1 SIMS collection, and it does not confer free or reduced-price benefits for school lunches.

*See also Question 11*

1. **If we have a new student transferring into our district or charter school this year—and therefore not on our match list—how can we determine whether that student has already been identified as low income?**

If the student transferred from another Massachusetts district or charter school, then the district or charter school should contact the previous district or school to determine whether and how the student was included on their match list.

1. **Who will have access to the information collected through the supplemental process?**

The information that families provide on this form and any supporting documentation will be kept by the school district and charter school and only used by the school or district or the Massachusetts Department of Elementary and Secondary Education to verify household income to determine the state and local funding that the district or charter school will receive.

Districts and charter schools should maintain the supplemental forms and supporting documentation in local records.

The Department will be establishing audit guidelines and an audit process to verify these forms and supporting documents. The Department will not collect the forms or documents.

1. **How should we store income verification documents to protect sensitive family information?**
Districts and charter schools should follow local document security policies.
2. **How long are we required to retain the documents?**Districts and charter schools should retain these documents for three years, consistent with requirements for eligibility for school nutrition programs.
3. **Will students identified through the supplemental process be treated differently for the purposes of calculating state aid or charter tuition?**No, students identified in the match file and through the supplemental process will all be considered low income.

For Chapter 70 and charter tuition purposes, districts and charters will be assigned to low-income groups based on the low-income percentage of total enrollment. Districts with higher concentrations of poverty have higher foundation budget rates. The thresholds and rates for the 12 low-income groups can be found in Table 2 of the [Student Opportunity Act](https://malegislature.gov/Laws/SessionLaws/Acts/2019/Chapter132).
4. **[New 9/30/2021] If we have identified a student as eligible for free or reduced-price school meals, can we use that status to inform outreach for the supplemental process?**

No, the supplemental collection should be administered as a separate and distinct process from income verification for school nutrition programs.

State and federal rules governing the use of the Virtual Gateway and the free and reduced-price lunch eligibility information restrict school nutrition staff from sharing information on students’ eligibility status (*EOHHS Virtual Gateway Services Agreement: Rider for School Nutrition Program Services*, available in the school lunch resource section of the [Security Portal](https://gateway.edu.state.ma.us/); section 9(b)(6) of the [Richard B. Russell National School Lunch Act](https://www.fns.usda.gov/nsla-amended-pl-116-94), 42 U.S. Code 1758; and [7 CFR 245.6 (Code of Federal Regulations)](https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-245/section-245.6). As such, the supplemental collection is not an authorized use of the Virtual Gateway at the local level.

1. **[New 9/30/2021] Should we distribute the supplemental form to all families with students not identified as low income in the match file?**No, districts and charter schools should direct outreach to families who have not been matched, but who may qualify as low income. The supplemental low-income collection has been made available in large part in response to local leaders’ requests to report specific students as low income who had not been identified through the matching process.
2. **[New 11/1/2021] Are tax returns acceptable documents for income verification?**

No, families must provide documents that show current income, and tax returns represent prior year income. Any documents submitted should provide proof of one month’s income from the month the family submitted the form or the prior month.
3. **[New 11/1/2021] When reviewing pay stubs for income verification, can we use the Year-to-date (YTD) amount to determine annual income?**

No, district and charter school officials should use the gross pay amount on the pay stub (i.e., before taxes and other deductions) and then calculate the annual equivalent by multiplying by the number of pay periods in the year, 12, 26, or 52.
4. **[Updated 8/14/2023] When will be our next opportunity to claim students as low income through the supplemental process?**

District and charter school officials will be able to claim students through DOE056 in the October 2024 SIMS collection. The Department will not use any DOE056 data reported in the March or End-of-Year SIMS collections.
5. **[New 5/27/2022] Can we offer families gift cards, cash payments, or other gifts to complete the form?**

No, districts and charter schools cannot offer gift cards, cash payments, or other gifts to families in exchange for completing the form.
6. **[Updated 8/14/2023] How do we claim students through the supplemental process using SIMS element DOE056?**
Once the district or charter school collects the required documentation from families, they can claim unmatched students that qualify as low income under the 185% FPL standard on their October SIMS submissions under SIMS data element DOE056, Supplemental Low-Income Indicator. Districts and charter schools should select the value 01 for students claimed to be considered for the supplemental low-income collection. SIMS element DOE056 has two acceptable values:

01: District confirms student has met the low-income criteria through the supplemental process and collected the required supporting documentation, or

00: District is not submitting student to be considered for the supplemental low-income process.

1. **[New 7/5/2022] Can we change the text in the supplemental form?**

No, the text in the form cannot be changed except to provide the district or charter school’s name and point of contact information where specified. We encourage districts and charter schools to distribute the form using their own letterhead, though that is not required.
2. **[New 7/5/2022] Can we have the same staff person process free and reduced-price meal forms and the supplemental low-income collection forms?**

Yes, the same person can process and enter data from the supplemental low-income collection and free and reduced-price meal forms into local student information systems. However, outreach to families for the supplemental collection must be separate and distinct from outreach for the school meals program.
3. **[Updated 8/14/2023] Do we need to have collected the forms and supporting documents before we submit our October SIMS data?**

Yes, districts and charter schools are required to collect and review signed forms and supporting documentation before submitting October SIMS data. While this does not have to be done before the SIMS submission window opens in early October, districts and charter schools must complete this process locally PRIOR TO certifying the October SIMS data. For the October 2023 SIMS collection, the certification deadline is October 27, 2023.