Student October Count and At-Risk/Free Lunch Eligibility

~ Understand your data, report your data accurately and maximize district funding ~

School Nutrition Unit

School Auditing Office

Virtual Housekeeping

- File share in the top right corner includes:
  - o At-Risk/Free Lunch Audit Resource Guide
  - o Best Practice Resource – At-Risk/Free Lunch
  - o Start of Year Checklist for Software Systems

- Use the chat box located in the bottom right corner to ask questions, or ask over the phone line

Learning Objectives

1. Define Student October Count data submission
2. Accurately report free and reduced-price eligibility
3. Maintain correct documentation for audit purposes
4. Utilize data validation recommendations

What is October Count & At-Risk Funding?

Student October Count Data Submission

- Student October Count is a one-day membership count
  - The pupil enrollment count date for 2020 is **October 1**

- Districts report **all** students who are actively enrolled and attending classes as of the pupil enrollment count date

- Districts report Student October Count data through the CDE Data Pipeline
  - Reported data is used to determine both the district's per-pupil and **at-risk** funding for the school year

At-Risk Count and Funding

- Free lunch eligibility status reported in Student October Count data submission is the primary determination of district's At-Risk funding
  - Funded students in grades K-12 only

- Valid lunch eligibility codes for the data submission include:
  - 00 = Not eligible/ Paid
  - 01 = Free lunch eligible
  - 02 = Reduced-priced lunch eligible

School Meal Eligibility
~Applications and Direct Certification~

Application

- Student determined free, reduced-price, or paid based on household size and income or assistance program information

Direct Certification

- Student determined free based on participation in an approved assistance program

FOR SCHOOL USE ONLY. DO NOT DISTRIBUTE TO HOUSEHOLDS.

Household Size	Free Guidelines					Reduced-Price Guidelines				
	Yearly	Monthly	2x/Month	Every Other Week	Weekly	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	$16,588	$1,383	$692	$638	$319	$23,606	$1,968	$984	$908	$454
2	$22,412	$1,868	$934	$862	$431	$31,894	$2,658	$1,329	$1,227	$614
3	$28,236	$2,353	$1,177	$1,086	$543	$40,182	$3,349	$1,675	$1,546	$773
4	$34,060	$2,839	$1,420	$1,310	$655	$48,470	$4,040	$2,020	$1,865	$933
5	$39,884	$3,324	$1,662	$1,534	$767	$56,758	$4,730	$2,365	$2,183	$1,092
6	$45,708	$3,809	$1,905	$1,758	$879	$65,046	$5,421	$2,711	$2,502	$1,251
7	$51,532	$4,295	$2,148	$1,982	$991	$73,334	$6,112	$3,056	$2,821	$1,411
8	$57,356	$4,780	$2,390	$2,206	$1,103	$81,622	$6,802	$3,401	$3,140	$1,570
For each additional family member add	$5,824	$486	$243	$224	$112	$8,288	$691	$346	$319	$160
Error-Prone Thresholds	$1,200	$100	$50	$44	$24	$1,200	$100	$50	$44	$24

The information provided on ...
your students qualify this information may be ...
anyone else. You are not required to consent to the release of your ...

☐ Do **NOT** share my information with any programs

Do not share my information with the programs I have checked:

☐ Medicaid/...

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- Carryover ➡ Student's prior year eligibility remains in effect until a new eligibility determination is made or, if no determination is made, for the first 30 operating days of the new school year

  o First day of instructional time whether in-person or remote

- If the count date falls within a district's carryover period, the district may report the student's carryover status (if no current year documentation has been provided)

- Documentation for current year eligibility and/or prior year eligibility must be maintained

Variance Waiver

- If the carryover period ends prior to the count date, a district can request a variance waiver

- Variance Waiver ➡ District requests an extension of the 30-day carryover provision for At-Risk October Count purposes only
  - Carryover in relation to school meal programs must follow standard drop-off and counting and claiming procedures

- Variance Waiver requests must outline reason for the waiver and be emailed to Jennifer Okes (okes_j@cde.state.co.us)
  - **DEADLINE was September 15th**
  - **Contact the School Auditing Office if you missed this deadline**

At-Risk Audit Documentation

At-Risk Audit Documentation

- Evidence of free lunch eligibility includes:
    - SNAP/TANF/MIGRANT Direct Certification Lists
    - Applications for Free and Reduced-Price School Meals
    - Family Economic Data Survey (FEDS) forms
    - Categorical Eligibility Determinations (migrant, homeless, runaway and/or foster child lists)
    - Extended Eligibility Documentation

SNAP/TANF/Migrant Direct Certification List

- Any student who appears on a district SNAP/TANF/Migrant direct certification list from July 1 through the pupil enrollment count date, must be reported as free lunch eligible

- Best practice ➡ Nutrition services conducts direct certification uploads as much as possible from July 1 through the pupil enrollment count date

- Ensure directly certified student statuses are updated accordingly

Applications and FEDS Forms

- Students determined free lunch eligible via an application or FEDS form, must be reported as free in the October Count submission

- FEDS forms are used when school sites:
  o Are <u>NOT</u> participating in the child nutrition program
  o <u>ARE</u> participating in Community Eligibility Provision (CEP)
  o <u>ARE</u> participating in the Provision 2 (non-base years)

- Must provide the application or FEDS form at the time of audit

- Online applications must show date of submission, proof of signature and have ability to be shown at time of audit

Provisional Programs

- CEP and Provision 2 are alternative operating models which serve all students meals at no cost to families

- CEP and Provision 2 (in non-base years) do not collect free and reduced applications, but rather FEDS forms for At-Risk funding purposes (as needed)

- For audit purposes, all meal eligibility documentation (applications, FEDS forms and direct certification lists) must be maintained throughout the provisional program cycle

Categorical Eligibility Determinations

- Students determined eligible for the following must be reported as free lunch eligible in the October Count submission:
  - o Foster Children
  - o Migrant Students
  - o Homeless or Runaway Students
  - o Head Start
- Categorical eligibilities must be confirmed via a district liaison list. Lists must contain student name and eligibility date
- Complete foster applications/FEDS form can be accepted at face-value
- See the School Meal Eligibility webpage for district liaison contacts: https://www.cde.state.co.us/nutrition/schoolmealeligibility

Extended Eligibility

- Extended Eligibility ➡Free eligibility is extended to all students in a household based on SNAP and/or TANF (via application or direct certification)

- Migrant, homeless, runaway, Head Start and foster eligibility cannot be extended

- Must document:

  o Originally directly certified student

  o Basis of extension (add siblings form/same address/application)

  o Date of extension

  o Initials

Immigrant/Migrant Families

- Applying for free or reduced-price school meals is not considered a public charge

  o Will not affect the probability of household members receiving a green card or visa

  o Important to communicate to district staff and households

- Information shared on the application is confidential and will not be shared to unauthorized parties

- Helpful resources:

  o https://protectingimmigrantfamilies.org/know-your-rights/

  o https://www.cde.state.co.us/nutrition/sharingfreeandreducedpriceinformationenglish

Back to School

What do we know?

- Schools will be operating different teaching models across the state for the 2020-2021 school year
  - Remote learning: no in-person contact or students on site
  - In-person learning
  - Physically distanced approach: small, in-person learning with remote learning rotations
  - Rolling starts and stops to in-person learning: move between in-person, or modified in-person and remote learning

- Districts must provide consistent and clear communication on how families can apply and why they should apply

- On Monday (8/31), the USDA extended the option for child nutrition program sponsors to operate the Summer Food Services Program and Seamless Summer Option through as late as December 31, 2020 (dependent on available funding).

- If a sponsor decides to extend these programs in their district, this means that all students eat for free (regardless of lunch eligibility status).

- Even though all students can eat for free, **districts must still have documentation to support free lunch eligibility if reported as such in the Student October Count Snapshot**.

Flexibilities for FEDS forms

- For the 2020-21 school year, district can accept scanned, faxed or photo-copies (i.e. pictures) of completed FEDS forms. These should be signed and dated.

Considerations and Planning

Communication

- Modified letter to household
- Instructions on how to apply and where
- Marketing materials
- In-person protocols

Applications

- Online
- Paper
- Kiosks
- Set up appointments

Assistance

- Fielding questions
- Application assistance
- Hold office hours
- Email and phone assistance hours

Data Validation

Data Validation

- Know the pupil enrollment count date
- Know which schools are:
  - o Participating in the National Lunch Program (NSLP)

  - o Participating in CEP or Provision 2

  - o Do not participate in the NSLP (e.g., charter schools, online schools, etc.)

- Ensure direct certification is conducted as many times as possible from July 1 through the pupil enrollment count date (for all students)
  - o Have a process to include students in non-participating schools

- Ensure nutrition records are syncing properly with your district's student information system (SIS)

- At the district <u>and</u> school level, verify the following
  - Students who appear on a Direct Certification list from July 1 through the pupil enrollment count date must be reported as free lunch eligible
  - Students who are identified categorically eligible for free lunch (e.g., foster, migrant, homeless, runaway, etc.) from July 1 through the pupil enrollment count date should be reported as free lunch eligible

- During prior years, thousands of directly certified students were not reported as free lunch eligible

- Cognos is a system accessed through the Data Pipeline where the user can check various data points from submitted district data

- The Cognos reports can help validate the accuracy of the data that have been submitted

- Districts are encouraged to:
  - Compare year over year free and reduced lunch eligible percentages (at the district and school level) and determine if changes are reasonable
  - Identify schools reporting no free lunch eligible students -> this should not be happening

- At the <u>student</u> level:

  o CEP and Provision 2 students identified as free lunch eligible at any time from July 1 of the base year through the pupil enrollment count date of the current year must be reported as free lunch in the data submission

  o Students reported as free or reduced-price in the base year retain the free status throughout the provision cycle

  o Should a family appear on a direct certification list OR provide a FEDS form that increases their benefit (i.e. reduced-price to free), the new documentation replaces prior documentation and new benefit level is established and date recorded.

- Ensure all software are updated for the current/new school year
  - o Use the "Start of Year Checklist" for free and reduced-price software systems
- Ensure systems are importing/exporting data correctly and notification processes are in place when imports/exports fail
- Attend available in-person trainings, online trainings and webinars on this topic
- Know the pupil enrollment count date and carryover drop-off date
  - o Use the "At-Risk Audit Resource Guide"

Value of Meal Eligibility

More than a Meal

Maximize Eligibility

Strong communication plan – Administrators, October count coordinator, district liaisons

Implement edit checks to ensure data accuracy

Work with district to report eligibility for ALL school sites

Contact Information & Resources

School Auditing Office

Rebecca McRee

Phone: 303-866-6805

Email: mcree_r@cde.state.co.us; audit@cde.state.co.us

Website: https://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced

School Nutrition Unit

Rachael Burnham (free/reduced lunch eligibility determination) and Benjamin Wetherbee (provisional programs)

Phone: 303-866-6450; 303-866-6529

Email: burnham_r@cde.state.co.us; wetherbee_b@cde.state.co.us

Website: https://www.cde.state.co.us/nutrition

Data Services Unit (Data Pipeline)

Brooke Robinson

Phone: 303-866-6840

Email: robinson_b@cde.state.co.us

Website: http://www.cde.state.co.us/DataPipeline/snap_studentOctober.asp