COLORADO
Department of Education

At-Risk Count Audit Overview:
Free and Reduced-Price Lunch Eligibility Reporting in Student October

School Auditing Office
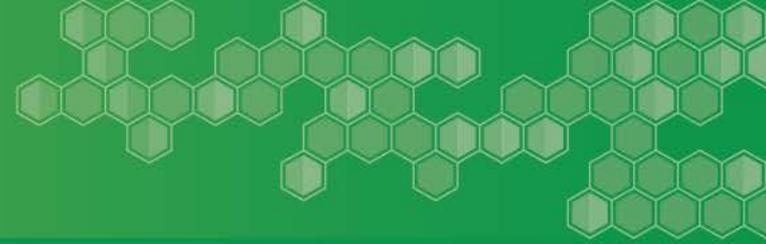
School Nutrition Unit

Date: **07/20/2023**

1. Student October Count data submission

2. School Meal Eligibility

3. At-Risk Audit Documentation

4. Data Validation Recommendations

5. Contact Information

6. Questions

The School Finance Unit at CDE:

- Calculates the "Total Program" funding based on district-reported data included in the yearly Student October Count data submission

- Calculates the Transportation reimbursement based on the CDE-40 data submitted yearly in September

Within School Finance, **the School Auditing Office**:

- Conducts compliance audits verifying that the data reported by districts in those data collections was accurate

- Provides technical guidance and support to districts throughout the year
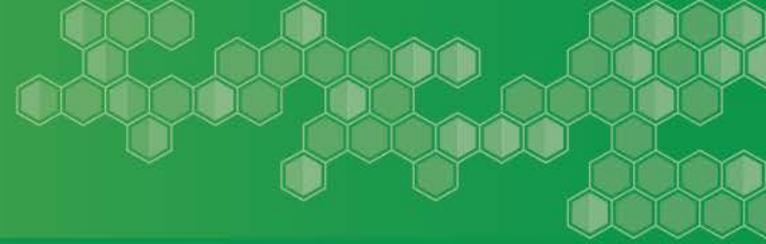
The School Nutrition Unit at CDE:

- Provides guidance and resources to districts operating school nutrition programs (SNPs):
    - National School Lunch Program (NSLP)
    - School Breakfast Program (SBP)
    - Afterschool Snack Program (ASP)
    - Fresh Fruit and Vegetable Program (FFVP)
    - Summer Food Service Program (SFSP)
- Conducts compliance audits verifying the SNPs are being implemented appropriately and provides technical assistance throughout the year
- Disseminates all free and reduced-price/school meal eligibility training and guidance

What is the Student October Count Data Submission?
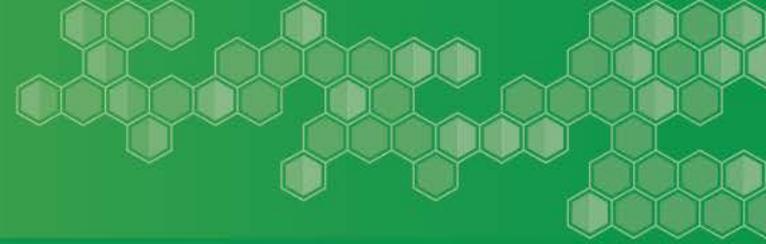
- Student October Count is a one-day membership count

- 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 to determine Total Program Funding
  - Per-Pupil (Pupil Count)
  - English Language Learner Count
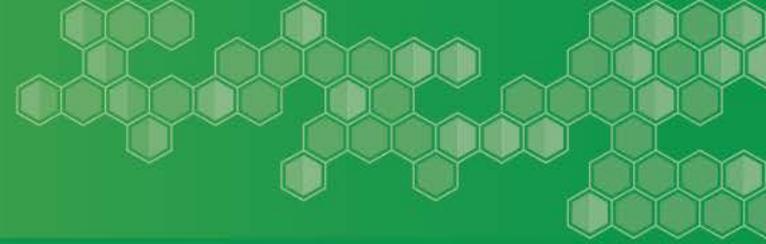 - At-Risk Count (Free & Reduced-Price Lunch Eligibility)

The 2023 pupil enrollment count date will be:
Monday, October 2, 2023

September						
Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

October						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

November						
Su	Mo	Tu	We	Th	Fr	Sa
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

- The 11-day count period includes the following (based on the district's adopted calendar):
  - The 5 student contact days before the pupil enrollment count date
  - The pupil enrollment count date
 - The 5 student contact days following the pupil enrollment count date

- The At-Risk count includes students reported in Student October who meet all of the following criteria:
  - Eligible for per pupil funding
  - Grades K-12
  - Free *or* reduced-price lunch eligible

- 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

Eligibility Determination
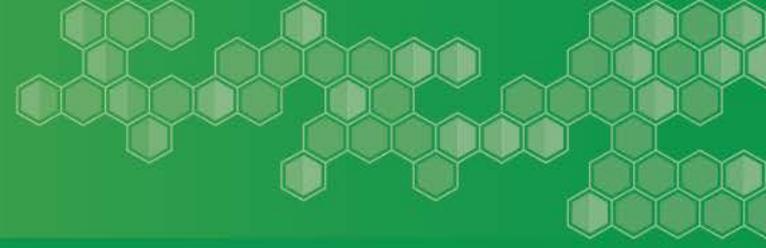
Application (or FEDS)
- Student determined to be free, reduced-price, or paid lunch eligible based on household size and income, assistance program information, or foster status

Direct Certification
- Student determined to be free lunch eligible based on assistance program information or migrant status

Categorical Eligibility
- Student determined to be free lunch eligible based on the individual student's foster, migrant, homeless, or runaway status
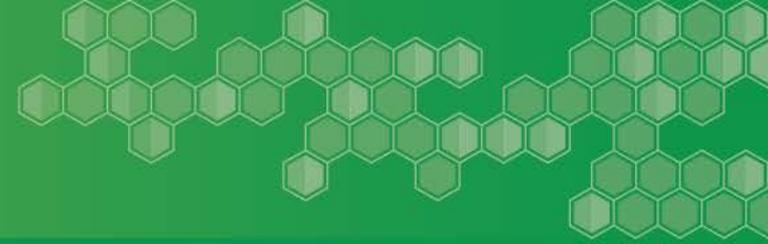
2023-2024 Income Eligibility Guidelines

| Free Guidelines						Reduced-Price Guidelines				
Household Size	Yearly	Monthly	2x/Month	Every Other Week	Weekly	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	$18,954	$1,580	$790	$729	$365	$26,973	$2,248	$1,124	$1,038	$519
2	$25,636	$2,137	$1,069	$986	$493	$36,482	$3,041	$1,521	$1,404	$702
3	$32,318	$2,694	$1,347	$1,243	$622	$45,991	$3,833	$1,917	$1,769	$885
4	$39,000	$3,250	$1,625	$1,500	$750	$55,500	$4,625	$2,313	$2,135	$1,068
5	$45,682	$3,807	$1,904	$1,757	$879	$65,009	$5,418	$2,709	$2,501	$1,251
6	$52,364	$4,364	$2,182	$2,014	$1,007	$74,518	$6,210	$3,105	$2,867	$1,434
7	$59,046	$4,921	$2,461	$2,271	$1,136	$84,027	$7,003	$3,502	$3,232	$1,616
8	$65,728	$5,478	$2,739	$2,528	$1,264	$93,536	$7,795	$3,898	$3,598	$1,799
For each additional family member add	$6,682	$557	$279	$257	$129	$9,509	$793	$397	$366	$183
Error-Prone Thresholds	$1,200	$100	$50	$44	$24	$1,200	$100	$50	$44	$24

Carryover

- A 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 school days of the new school year

  - From the first day of instructional time

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

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

Carryover Variance Waiver
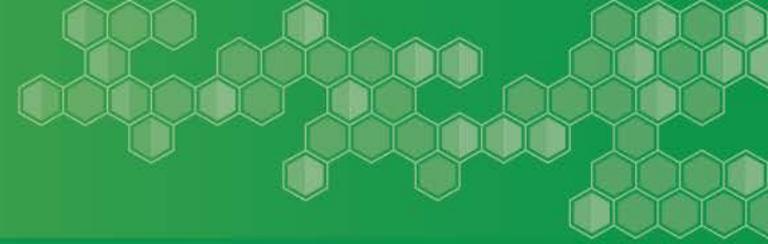
- If the 30-day carryover period ends prior to the count date, a district can request a variance waiver

- Variance Waiver
  - District may request an extension of the 30-day carryover provision for At-Risk 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 the reason for the waiver and be emailed to Jennifer Okes (okes_j@cde.state.co.us).
  - **DEADLINE is September 15th**

NEW: Healthy School Meals for All
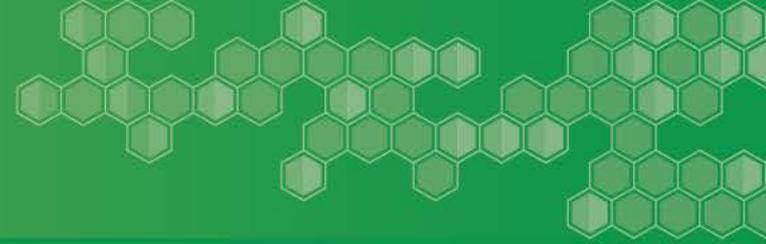
- Pursuant to HB22-1414 and beginning with the 2023-2024 school year, districts may opt-in to participate in the Healthy School Meals for All program (HSMA) which allows districts and schools participating in the National School Lunch Program to provide free meals to all students.

- Districts that choose to opt-in to HSMA **will still need to provide student eligibility documentation**. Districts must continue to keep records of eligibility and continue to conduct direct certification per existing guidance.

- While all students attending an opt-in district are eligible to eat meals for free, only students with qualifying eligibility documentation on file may be reported as free or reduced-price lunch eligible in the Student October Count data submission.

- Pursuant to HB22-1202, the at-risk funding calculation method is changing.

- Pursuant to SB23-287, these changes will be implemented starting with the **2024-2025** school year.

- The new calculation will take into consideration:
  - Percentage of students certified as eligible for free lunch based on receipt of SNAP, TANF, FDPIR benefits or participating in Medicaid (i.e., Directly certified) **OR** categorical eligibility (foster, homeless, migrant, etc.); AND
  - A neighborhood socioeconomic status index that is linked to each student's census block group.

- Districts should anticipate that beginning with **2024-2025**, required audit documentation to support the district's funded at-risk counts will change.

NEW- Free Lunch Eligibility Identification
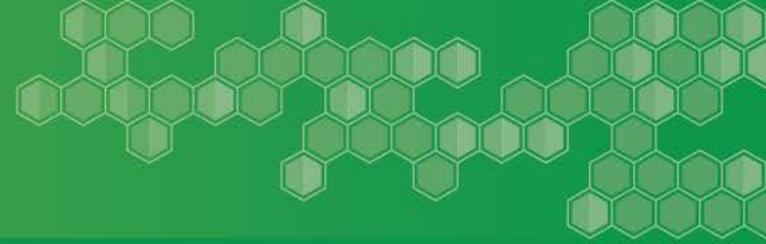
- To assist in collecting the needed data for the changes to the at-risk funding calculation, beginning with the 2023-2024 school year, the "Free Lunch Eligibility Identification" field has been added to the Student October Snapshot.
  - Any student reported with a "Free/Reduced Lunch Price Eligible" value of "01" (free lunch eligible) will be required to have a value other than "0" in this new field

- Applicable values are:

0	Not identified as Free Lunch Eligible
1	Direct Certification (Medicaid, SNAP, TANF, FDPIR) – including extension to other household members
2	Other Source Categorical (Migrant, Homeless, Runway, Foster, Head Start documented participation) – LEA lists, student-specific eligibility
3	Application (Application for Free and Reduced-Price Meals, Family Economic Data Survey Form, or Combination form)

NEW- At-Risk Measure – SES Data Pilot Project

- The School Finance and Data Services units at CDE are currently working with districts throughout the state in a Data Pilot Project.
  - During this pilot, CDE will develop guidance and instructions on how to obtain and report student level census block data needed for the implantation of the new at-risk measure/calculation beginning in **2024-2025**.
- Communications will be sent out to districts in preparation for the new data requirement.
- At this time, it has yet to be determined how this additional information will be provided to CDE.
  - i.e., it may be incorporated into the Student October Snapshot, obtained through a new data file or collection, etc.

At-Risk Audit Documentation

Website:

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

Resource Guide:

https://www.cde.state.co.us/cdefinance/2022_at-risk_audit_resource_guide

At-Risk Audit Documentation

Documentation Quick Reference Guide:
https://www.cde.state.co.us/cdefinance/at-risk_documentation_quick_reference

Applications and FEDS Forms
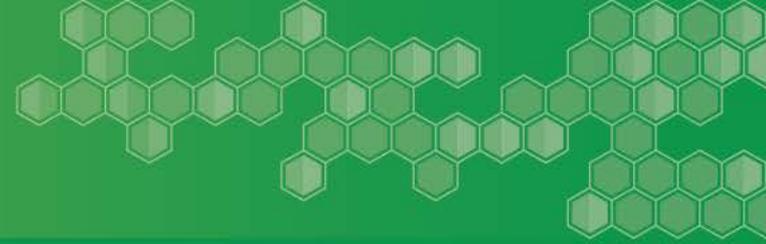
- Students determined to be free or reduced-price lunch eligible via an Application or FEDS form must be reported as such in the October Count submission

- Districts must be able to provide copies of the Application or FEDS form at the time of audit, including online forms

- Online Applications/FEDS forms must show the date of submission & proof of signature
  - For online **FEDS** forms, review the additional "Online Signature Guidance":
  - (http://www.cde.state.co.us/cdefinance/school_auditing_online_signatures)

Audit Documentation

- Pupil Count Document Checklist (PDF)
- Online Signature Guidance (PDF)

Application- Template

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

Family Economic Data Survey (FEDS) Form- Template

http://www.cde.state.co.us/**cdefinance**/auditunit_atrisk_freeandreduced

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[Insert District Name] 20**XX**-20**XX** Family Economic Data Survey

Complete one survey per household. Please use a pen (not a pencil).

Apply online at **[Insert Webpage]**

STEP 1 List all student's attending **[Insert District Name]** (if more spaces are required for additional names, attach another sheet of paper)

Student's First Name	MI	Student's Last Name	No Income	Birth Date (M M D D Y Y)	Grade		Foster Child	Head Start	Runaway	Homeless	Migrant

Check all that apply. Read Federal Economic Data Survey Application Instructions for more information.

STEP 2 If household members (including you) currently participate in one of the following assistance programs: SNAP, TANF, or FDPIR list the case number below.

Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF/Colorado Works – Basic Cash Assistance or State Diversion), or Food Distribution Program on Indian Reservations (FDPIR). **Provide case number and skip to Step 4.**

SNAP Case Number   TANF Case Number   FDPIR Case Number

STEP 3 Report income for ALL household members (Skip this step if you provided a case number in STEP 2)

A. Student Income
Please include the **TOTAL** income, if any, received by all students' listed above.

Student Income $ ____

How Often? ○ Weekly ○ Bi-Weekly ○ 2x Month ○ Monthly ○ Annually

B. All Other Household Members (including yourself)
List all other household members not listed in Step 1 (including yourself) even if they do not receive income. For each household member listed, if they do receive income, report **TOTAL GROSS (BEFORE TAXES AND OTHER DEDUCTIONS)** for each source in whole dollars (no cents) only. If they do not receive income from any source, write '0'. If you enter '0' or leave any fields blank, you are certifying that there is no income to report.

Names of Other Household Members (First and Last)	Earnings from Work	How Often? (Weekly, Bi-Weekly, 2x Month, Monthly, Annually)	Public Assistance/ Child Support/Alimony	How Often? (Weekly, Bi-Weekly, 2x Month, Monthly, Annually)	Pensions/Retirement/ All Other Income	How Often? (Weekly, Bi-Weekly, 2x Month, Monthly, Annually)
	$	○○○○○	$	○○○○○	$	○○○○○
	$	○○○○○	$	○○○○○	$	○○○○○
	$	○○○○○	$	○○○○○	$	○○○○○
	$	○○○○○	$	○○○○○	$	○○○○○

Total Household Members (Students' and Adults) ____

STEP 4 Contact information and adult signature. Mail signed and completed application to: **[Insert School/District Mailing Address]**

"I certify (promise) that all information on this survey is _true_ and that all income is reported. I understand that this information is given in connection with the receipt of Federal, State, and/or Local Education Program funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose access to waivers of fees and the district/school may lose funding, and I may be prosecuted under applicable State and Federal laws."

CO

Mailing Address or PO Box	Apt. # or Lot #	City	Zip Code	Email Address

Phone	SIGNATURE of Adult Household Member	Printed First and Last Name of Signer	Today's Date

STEP 5 Release of Information

The information provided on this survey will be used in conjunction with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (SCHIP) offices to seek enrollment of children into the above programs. Also, if your students qualify this information may be shared with the school/district for the purpose of waiving certain school/district program fees that your child(ren) might otherwise be required to pay. The school/district is not permitted to share your information with anyone else. You are not required to consent to the release of your information; this will not affect your student(s)' eligibility for school meals. Your information _WILL_ be shared unless you check one of the boxes below.

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

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

☐ Medicaid/SCHIP   ☐ **List Specific Program**   ☐ **List Specific Program**   ☐ **List Specific Program**   ☐ **List Specific Program**

When To Distribute a FEDS Form

- Only distribute Applications to students enrolled in schools that participate in Federal Child Nutrition Programs
  - If a family turns in an Application that includes students who are attending both participating and non-participating sites, that Application can be used to determine lunch eligibility in Student October for all listed students

- Use FEDS forms when school sites:
  - Are NOT participating in the child nutrition program
  - ARE participating in Community Eligibility Provision (CEP)
  - ARE participating in Provision 2 (non-base years)

At-Risk Eligibility Documentation

- Sites that do not participate in the National School Lunch Program must still maintain appropriate At-Risk eligibility documentation

- Districts that participate in Healthy School Meals for All must still maintain appropriate At-Risk eligibility documentation

Categorical Eligibility Determinations

Students should be reported as free lunch eligible in the October Count submission if they are in one of the categories below:

Designation on a completed Applications/FEDS form can be accepted at face value

Foster Children

Designation must be confirmed via the corresponding liaison list*

Migrant Students

Homeless or Runaway Students

Head Start

*Liaison lists must contain student names and dates of identification.

Categorical Eligibility Determinations
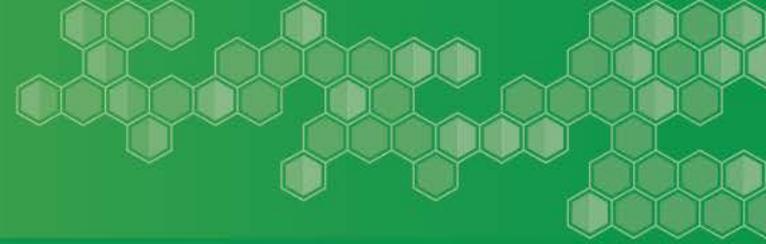
Regional Migrant Liaisons

- The Office of Migrant Education at the Colorado Department of Education, is federally funded under Title I, Part C of the Elementary and Secondary Education Act (ESEA). The Colorado Migrant Education Program coordinates and delivers services through five regional offices.

- Find your district's Regional Migrant Liaison: https://www.cde.state.co.us/migrant

McKinney-Vento Homeless Education Liaisons

- Every school district has a designated McKinney-Vento Homeless Education Liaison responsible for identifying MKV students and providing resources to help these students.

- Find your district's designated MKV Liaison: https://www.cde.state.co.us/studentsupport/homeless_index

Child Welfare Liaisons (CWEL)

- Under C.R.S. 22-32-138, each school district and the state charter school institute, shall designate a person to act as the Child Welfare Education Liaison (CWEL) for the district. This person serves as the single point of contact to help facilitate school stability and seamless transfers for students in foster care.

- Find your district's designated CWEL: https://www.cde.state.co.us/studentsupport/fostercare_index

SNAP/TANF/FDPIR/Migrant Direct Certification
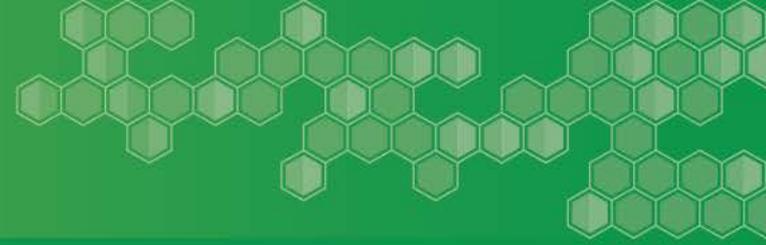
- Any student who appears on a district Direct Certification list from July 1 through the pupil enrollment count date must be reported as free lunch eligible (*or reduced-price eligible if Medicaid-REDUCED)

- Best practices:
  - Conduct Direct Certification uploads as often as possible from July 1 through the pupil enrollment count date
  - Consider conducting a complete upload on the pupil enrollment count date, including students at non-participating sites
    - District must reimburse the nutrition fund as appropriate for time spent on this process for non-participating sites

- To qualify based on SNAP/TANF/FDPIR through any state other than Colorado, the family must provide a letter or other documentation from that state's benefit agency

Extended Eligibility
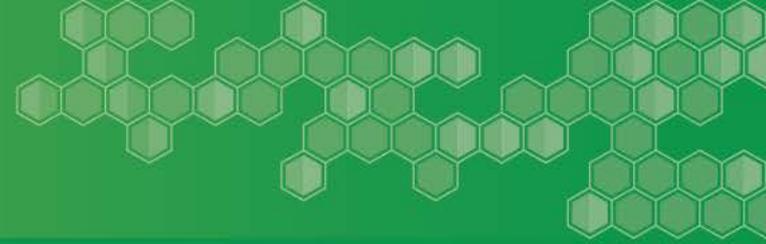
- Free lunch eligibility is extended to all students in a household based on one member's eligibility for SNAP, TANF, and/or FDPIR (via Application or Direct Certification)

- Medicaid students may be designated as either free or reduced-price eligible, and may extend that eligibility to all students in their household

- Categorical migrant, homeless, runaway, Head Start, and foster eligibility **cannot** be extended to other household members

Extending Eligibility from Different DC Match Types

In the export file, students may be listed by a number of Eligibility types.

Match Type	Action
SNAP	Free meals –can extend eligibility
TANF	Free meals –can extend eligibility
BOTH	Free meals based on SNAP status –can extend eligibility
MEDICAID FREE	Free meals –can extend eligibility
MIGRANT	Free meals only – NO extension
MEDICAID **REDUCED**	**Reduced** meals –can extend eligibility
SNAP/MIGRANT	Free meals based on SNAP status –can extend eligibility
MEDICAID-FREE/MIGRANT	Free meals –can extend eligibility
BOTH/MIGRANT	Free meals based on SNAP status –can extend eligibility
TANF/MIGRANT	Free meals based on TANF status –can extend eligibility
MEDICAID-**REDUCED**/MIGRANT	Free meals based on migrant –can extend **reduced** eligibility

Extended Eligibility Documentation

- The updated Direct Certification system within the Colorado Nutrition Portal includes functionality to extend eligibility based on household address; if the district uses this system, no additional documentation is needed for these extensions

- If the district uses a separate process, documentation *must* include:
  1. Date of extension
  2. Original Directly Certified student's name
  3. DC list date (and/or a copy of the list)
  4. Basis of extension (add siblings form/same address/ application/FEDS)

Extended Eligibility
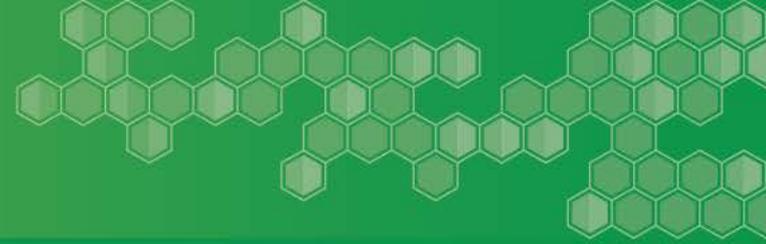
Examples of how the required Extended Eligibility information may be documented include, but are not limited to:

- Comments or notes entered into the district's point of sale system
- Handwritten comments or notes on the printed direct certification list
- On a separate document that is maintained by the district's nutrition services department that contains all applicable information
- A completed "Extended Eligibility to Additional Household members" letter

Provisional Programs
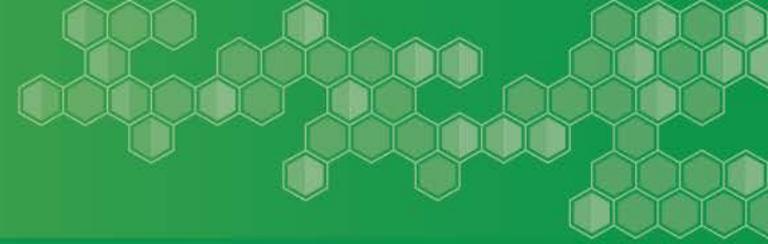
- CEP and Provision 2 are alternative operating models which serve all students meals at no cost to families
  - CEP and Provision 2 (in non-base years) do not collect Applications for Free and Reduced-Price School Meals
  - These programs collect FEDS forms for At-Risk funding purposes (as needed)

- For audit purposes, all meal eligibility documentation must be maintained throughout the provisional program cycle
  - Applications, FEDS forms, <u>Combination Application/FEDS form</u>, and complete direct certification lists

Immigrant/Migrant Families
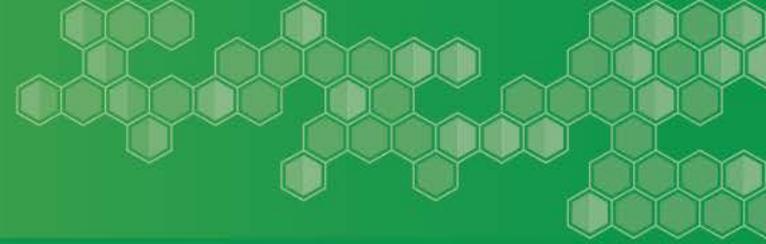
Important to communicate to district staff and households:

🚫	🚫	🚫
Applying for free or reduced-price school meals is <u>not</u> considered a public charge	Applying for or receiving free or reduced-price school meals will <u>not</u> affect the probability of household members receiving a green card or visa	Information shared on the Application is confidential and will <u>not</u> be shared to unauthorized parties

Helpful resources:
- **Form Letter to Families re: Sharing of School Meal Eligibility Information**
  - https://www.cde.state.co.us/nutrition/sharingfreeandreducedpriceinformationenglish
- **Top 5 Facts About Public Charge**
  - https://protectingimmigrantfamilies.org/know-your-rights/
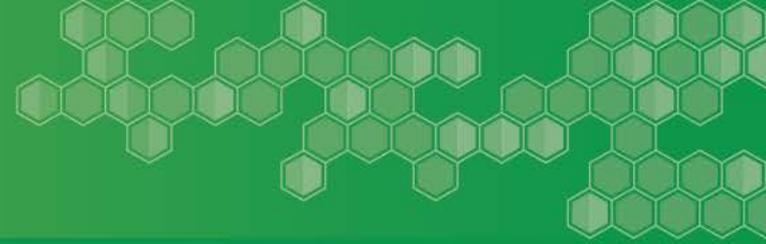
- Regardless of how a district or CSI determines student meal eligibility, the documentation must be retained and available until audited by the Department or until five years from the certification due date, whichever comes first.

- Depending on the timing of the audit and the CEP/Provision 2 base year, CEP/Provision 2 schools and districts may need to retain at-risk eligibility documents for up to 10 years to include the entire CDE-approved provision timeline

Data Validation
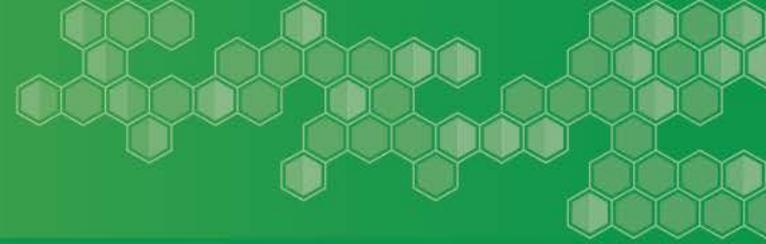
- Download & use the current year's [At-Risk Audit Resource Guide](#)
    - https://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced

- Know the pupil enrollment count date and carryover drop-off date

- Assign at least two district staff to be knowledgeable about processing free and reduced-price applications

- Update all software for the current/new school year
    - o Use the "[Start of Year Checklist](#)" for free and reduced-price lunch software systems
        - o https://www.cde.state.co.us/nutrition/softwarechecklist

Data Validation
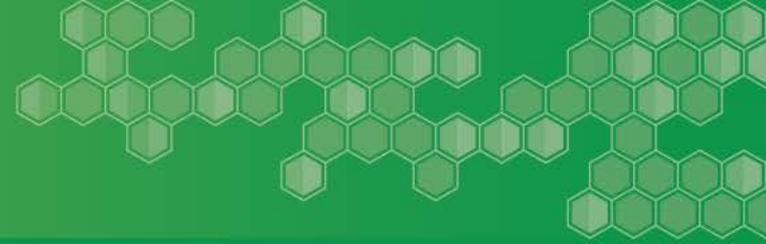
- Know which schools are:
  - o Participating in the National Lunch Program (NSLP)
  - o Participating in CEP or Provision 2
  - o NOT participating in the NSLP (e.g., charter schools, online schools, etc.)
- Ensure Direct Certification is conducted as many times as possible from July 1 through the pupil enrollment count date (for all students)
  - o Have a process to include students in non-participating schools
  - o Plan to complete a list on count day if possible
- Ensure nutrition records are synching properly with your district's Student Information System (SIS)
- Ensure systems are importing/exporting data correctly and notification processes are in place when imports/exports fail

Data Validation
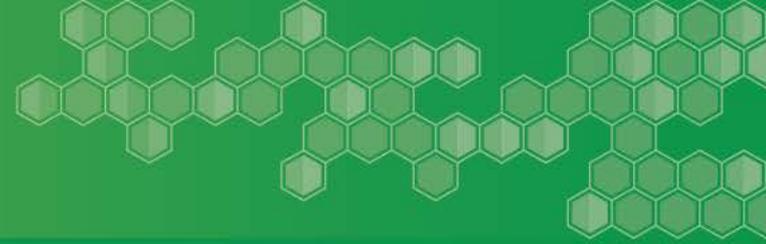
At the district <u>and</u> school levels, verify the following:

- Students who appear on a Direct Certification list from July 1 through the pupil enrollment count date must be reported as free lunch eligible (or reduced-price lunch eligible for Medicaid-Reduced)

- 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 must be reported as free lunch eligible

Data Validation: CEDAR/COGNOS Reports

- Cognos is a system accessed through IdM or 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 has been submitted

- Districts are encouraged to:

  - Compare year-over-year free and reduced-price lunch eligible percentages (at the district and school levels) and determine if changes are reasonable

  - Identify schools reporting no free lunch eligible students (this should not be happening)

Data Validation: CEDAR/COGNOS Reports

- At a minimum, the following CEDAR/COGNOS reports should be reviewed prior to finalizing the Student October Snapshot:
    - District Summary of Pupil Counts
    - District Summary of Pupil FTE by County Fragment (if applicable)
    - School Summary of Pupil Counts
    - Summary of Pupil Counts for Specific Schools

- Descriptions of each of these reports can be found in the [CEDAR/COGNOS Report Guide](https://www.cde.state.co.us/datapipeline/studentoctoberreportdefinitions)
    - https://www.cde.state.co.us/datapipeline/studentoctoberreportdefinitions

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

- CEP and Provision 2 students identified as free or reduced-price 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 such in the data submission

  - Students retain this status throughout the provision cycle

- If a family appears 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

Annual Checks by CDE Staff
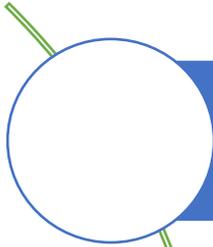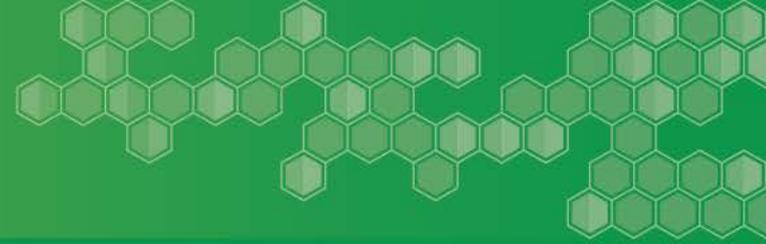
During the Student October Data Collection process, the School Auditing Office monitors various data points
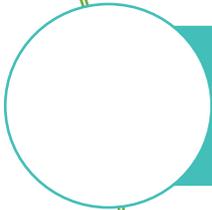
You may receive an email notification that directly certified students in your district were not reported with an FRL code of 01

Contact Information & Resources

School Auditing Office

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

Email: audit@cde.state.co.us

School Nutrition Unit

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

Email: free&reducedpriceschoolmeals@cde.state.co.us

Data Services Unit (Data Pipeline)

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

Brooke Wenzel: wenzel_b@cde.state.co.us

Questions?

Please type your question into the chat box or raise your hand to be unmuted. (You only need to click "raise hand" once.)