

At-Risk Count Acknowledgment Form
For
Community Eligibility Provision (CEP) Districts and Schools
SY 2022-2023

At Risk Count Overview

Each year all public school districts across the state of Colorado participate in the Student October Count data submission to the Colorado Department of Education (CDE). The purpose of this data collection is to obtain required student level data as provided for by state statute and board rule, including information regarding students' eligibility for at-risk funding as outlined in the Public School Finance Act of 1994 ([Section 22-54-103](#) (1.5), C.R.S.) and the Rules for the Administration of the Public School Finance Act of 1994 ([1 CCR 301-39-R-6.00](#)). The Colorado Department of Education collects this data through the Data Pipeline with the Data Services Unit of CDE overseeing the collection.

For every student included in the district's Student October Count data submission, the district must report the student's free and reduced lunch eligibility status as of the pupil enrollment count date (usually 10/1). While several factors come into play when determining a district's at-risk funding, the most significant factor is the total number of students reported as free lunch eligible.

In an effort to ensure accurate reporting of those data fields associated with at-risk funding, the Field Analyst Support Team (FAST) of the Division of School Finance and Operations for the Colorado Department of Education conducts periodic compliance audits of each district's Student October Count data. During each at-risk count audit, a random sample of reported free lunch eligible students is selected for eligibility confirmation.

At-Risk Count- Acceptable Audit Documentation (General)

For purposes of the at-risk audit, districts must be prepared to provide documentation to support any funded student's free lunch eligibility status as reported in the Student October Count data submission. Documentation submitted to the Field Analyst Support Team during the at-risk count audit will be evaluated based on criteria outlined in the United States Department of Agriculture (USDA) Eligibility Manual for School Meals (Determining and Verifying Eligibility), and must be dated on or before the pupil enrollment count date (usually 10/1) of the current school year, unless the use of carryover documentation is allowable and appropriate.

Acceptable documentation to support a student's free lunch eligibility includes:

- Direct Certification Lists
- Application for Free and Reduced-Price School Meals
- Family Economic Data Survey (FEDS)
- Categorical Eligibility Determinations (such as district migrant, homeless, runaway and /or foster child lists)

Absent current year documentation, a district may submit the student's prior year eligibility documentation to evidence free lunch eligibility if the pupil enrollment count day or alternative count day falls within the first 30 school days of the current year. Carryover of previous year's eligibility applies to direct certification, categorical eligibility determinations, income applications, newly enrolled children from households with children who were approved for benefits in the Local Education Agency (LEA) the previous year and previously approved children who transfer from one school to another under the jurisdiction of the same LEA. Carryover is for up to the 30th school day into the current year or until a new eligibility determination is made, either approved or denied. *The new eligibility determination supersedes the carryover eligibility.*

For the at-risk count audit, districts must retain all required documentation until audited by CDE or until five years from the certification due date (Nov. 10), whichever comes first. *Special provision school/districts (including CEP and Provision 2) must retain base year direct certification data and applications for up to 8 years in order to ensure documentation for those students identified as free lunch eligible during the base year of that program.*

Community Eligibility Provision (CEP) Schools and Districts

The goal of the Community Eligibility Program (CEP) is to improve access to free school meals in eligible high poverty LEAs and schools, and to eliminate the administrative burden of collecting household applications. Participation eligibility in CEP is determined based a minimum threshold being met as of April 1st of the preceding school year of students being identified as free lunch eligible with direct certification, homeless lists, migrant lists, foster lists, runaway lists and Head Start lists. Once an identified eligible district or school elects to participate in CEP, they no longer have to collect documentation (including applications for free and reduced price school meals) in order for all of their students to eat for free during the remainder of the 4-year cycle.

At-Risk Count- Acceptable Audit Documentation (Community Eligibility Provision - CEP)

While the administrative burden of collecting household, applications is eliminated for the National School Lunch and School Breakfast Programs, this burden is reduced but not eliminated for at-risk funding purposes. During the base year prior to the pupil enrollment count date (usually 7/1 – 10/1), the CEP district or school must collect documentation evidencing free lunch eligibility for its students in order to report them as such in the Student October Count data submission. Allowable documentation to support free lunch eligibility for students attending a participating CEP district or school is the same as all other non-CEP schools, however keep in mind that per CEP guidelines Applications for Free and Reduced-Price School Meals cannot be disseminated to households of CEP school students.

In order to align with the goal for CEP (to reduce/eliminate the administrative burden of collecting household applications/documentation), the following is true for students reported at participating CEP districts and schools in the Student October Count data submission ***ONLY: If a student is reported at a participating CEP district or school in the Student October Count data submission, the district can report the student as free lunch eligible if it has documentation for the student evidencing free lunch eligibility at any time between, and including, the base year through the pupil enrollment count date of the current Student October Count data submission (usually 7/1 of the base year through 10/1 of the current school year) not to exceed the 4-year cycle.***

Things to Consider:

- If a CEP district or school decides to reset their base year, then all new base year documentation must be re-collected.
- In the event documentation is not collected evidencing free lunch eligibility prior to the pupil enrollment count date of the base year (for any student reported at a CEP district or school), the district should continue to monitor these students to determine if they may be eligible to be reported as free lunch eligible in subsequent Student October Count data submissions during the 4-year cycle.
 - If students transfer into a CEP school after the base year Student October Count data submission, the district will need to have documentation evidencing free lunch eligibility in order to submit the student as such in subsequent Student October Count data submissions.
- Districts with CEP schools should ensure that they have a process in place for tracking lunch eligibility status for students reported at CEP schools in the Student October Count data submission as this status may not always reflect the student's actual eligibility status for the National School Lunch and School Breakfast Programs.
- Districts cannot use funds received from the National School Lunch and School Breakfast Programs to process Family Economic Data Survey forms.
- District Nutrition Service staff should coordinate with the District Pupil Count / Student October Count coordinator to ensure accurate reporting and collection of required audit documentation.

We acknowledge the reporting criteria and audit documentation requirements for students attending a participating CEP district or school and reported as free lunch eligible in our District's Student October Count data submissions during the CEP cycle. Further we understand that inaccurate reporting or insufficient documentation evidencing free lunch eligibility for these students may impact our district's at-risk funding for the school years within the CEP cycle.

Food Service Director (signature)

Print

Date

District Pupil Count Coordinator (signature)

Print

Date