

Student October At-Risk 2012 Resource Guide

Colorado Department of Education

Public School Finance Unit



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Overview

Each year all public school districts and facilities 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, including information regarding students' funding eligibility and lunch eligibility ("Free", "Reduced", or "Paid") as outlined in the Public School Finance Act of 1994 (22-54-101, C.R.S.). The Colorado Department of Education collects these data through the Automated Data Exchange (ADE) with the Information Management Services (IMS) unit of CDE overseeing the collection.

In an effort to ensure accurate reporting of those data fields associated with student and at-risk funding, the Audit Team of the Public School Finance Unit for the Colorado Department of Education conducts periodic compliance audits of each district's student October count data. The Audit Team audits districts every one to four years, the frequency of which is determined by a number of factors including, but not limited to, the size and location of the district, as well as issues or concerns that might have arisen from prior audits.

The purpose of this resource guide is to provide helpful information to assist districts in preparing for their **at-risk count audit**. With the emergence of new technology capabilities, it is recommended whenever possible that districts retain their audit documentation in electronic format.

At-Risk Count Funding

At-Risk funding for each district is determined by a number of factors, including the number of students reported as free lunch eligible in a given district's Student October Count data submission to the Colorado Department of Education. 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 its Student October Count data submission. Acceptable documentation to support a student's free lunch eligibility includes:

- Application for Free and Reduced Price School Meals (for the applicable school year)
 - Prior Year "carryover" Application for Free and Reduced Price School Meals
- Family Economic Data Survey
- Direct Certification List
- Migrant, Homeless, and Runaway district lists

Application for Free and Reduced Price School Meals

If a student is deemed “Free lunch” eligible through the completion of an Application for Free and Reduced Price School Meals, the student may be reported as such in the district’s Student October Count data submission. The district must ensure that the application is filled out correctly and completely, as well as processed accordingly by the district. Below are some guidelines for the at-risk funding audit as it relates to the 2012-2013 application.

- **Part 1:** This section should include a list of all students attending school in your district. All applicable fields in this section should be completed/checked for each student, including:
 - Foster Child Status
 - Student’s First and Last Name
 - “No Income” flag (if applicable) - if this field is left blank, then the student should appear in Part 4 of the application with the applicable income amount.
 - Homeless (checked indicates “Yes,” blank indicates “No”)
 - Migrant (checked indicates “Yes,” blank indicates “No”)
 - Runaway (checked indicates “Yes,” blank indicates “No”)
- **Part 2:** If the family qualifies for the Supplemental Nutrition Assistance Program (SNAP) or Food Distribution Program on Indian Reservations (FDPIR), this section must be filled out completely by listing both the name of the household member receiving benefits and the case number. If either is missing and a student was flagged as free lunch eligible based on this criteria, the district’s at-risk count may be adjusted.
- **Part 3:** Homeless, Migrant or Runaway: If an application is received with the H/M/R box checked the District must confirm this with the proper district official before the student can be approved for meal benefits.
- **Part 4:** This section should list all household members who were not included in Part 1, as well as any student included in Part 1 who did not have the “No Income” box checked (i.e., students who have income).
 - If the application does not have any student that has been flagged as a foster child, migrant, homeless, runaway, or a SNAP/FDPIR recipient, then the income listed in Part 4 will be used to determine whether the household income qualifies the student(s) listed for free lunch eligibility.
- **Part 6:** If Part 4 is completed, then this section must also be completed. The parent/guardian completing the form must sign and date the application. If income is included, the parent/guardian must also provide the last 4 digits of his/her social security number (or select “I do not have a Social Security Number” check box). If any of this required information is not complete, the district’s at-risk count may be adjusted.
 - The application must be dated within 30 calendar days following the pupil enrollment count day.
 - Applications dated 31 days or more following the pupil enrollment count day will not be acceptable for verification of free lunch eligibility as it is reported in the Student October data submission.

- **District processing:** a district staff member must sign and date the application as well as indicate approval or denial for benefits.
- In the event an application is modified/changed by the district based on a household needing to change income information or household size, the district must document the change as follows:
 - Indicate the date of the call/contact; **and**
 - Provide the name of the household member requesting the changes; **and**
 - Note the information changed; **and**
 - Include the initials/signature of the district staff making the changes.

Carryover Applications

Absent a current year application, the district may submit the student's approved free lunch application from the prior year that is effective for a maximum of 30 school days into the current school year.

Reference	CSBOE Rule 2254-R-6.00; 22-54-103 (1.5) (b) I-III, C.S.R.
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Family Economic Data Survey

A student may be reported as free-lunch eligible in the Student October data submission if he/she has a current year Family Economic Data Survey that has been approved within 30 calendar days following the pupil enrollment count day. This form can be used by schools that are not participating in the Federal National School Lunch or School Breakfast programs. For purposes of the at-risk count audit, the Family Economic Data Survey:

- Must be signed and dated by an adult member of the household (*electronic signatures are not permitted*).
- Must include the names of all household members, including the name(s) of the child(ren) for whom the application is made.
- Must include gross income for all household members who work.
- If a student is a foster child, please check the box for "Foster Child" in Section 1 for that particular child. (*Foster children are the children who are the legal responsibility of a welfare agency or court.*)
- School district personnel should not alter any information on the survey. If there is a change to the family's gross income, the district should obtain a new survey or attach a pay stub that contains the family gross income and is dated appropriate to the applicable Student October Count.
- Surveys dated 31 days or more following the pupil enrollment count day will not be acceptable for verification of free lunch eligibility as it is reported in the Student October data submission.

Direct Certification

A student who qualifies to be on the direct certification match report, for the current school year, prior the pupil enrollment count day, is automatically eligible for free lunch. A copy of the official direct certification match report as of the pupil enrollment count day (or the alternative count date which includes the student's name) is required for audit if the student was reported as free lunch eligible in the Student October data submission, based on this documentation.

For those students who are not listed on the direct certification match report, but who reside or belong to the same household as student(s) who are listed on the direct certification match report, they may be reported as free lunch eligible in the Student October data submission if the following criteria have been met:

- The student(s) have been handwritten or added to the direct certification match report by the district.
- Next to the student's name, the district must indicate the date the student(s) were added, and the name of the sibling or student that is in the same household that is on the match report.
- The district representative adding the student must initial or sign the addition.
- The carryover status for the direct certification match report is the first 30 school days or until a new status is determined, whichever is first.

Migrant, Homeless and Runaway Students

If a student is identified as migrant, homeless or as a runaway, the student is automatically eligible for free lunch. These students may be reported as free-lunch eligible in the Student October data submission. The district must provide the following documentation:

- **Migrant Students:**
 - District Migrant List: the student has been identified as "migrant" by the district's Migrant Education Program Director using guidelines established under Section 107 of the Child Nutrition and WIC Reauthorization Act of 2004, and is included on the district's Migrant List (the list must have been generated on or before 30 calendar days following the pupil enrollment count day, and dated appropriately).
- **Homeless/Runaway Students:**
 - District Homeless/Runaway List: the student has been identified as "homeless" or "runaway" by the district's Homeless Liaison using guidelines established under McKinney-Vento Assistance Act, and is included on the district's Homeless/Runaway List (the list must have been generated on or before 30 calendar days following the pupil enrollment count day, and dated appropriately).

Reference	CSBOE Rule 2254-R-6.00; 22-54-103 (1.5) (b) I-III, C.S.R.
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Sample of the 2012-13 Application for Free and Reduced Meals Form

[illegible]

Appendix B

Updated August 2012

Colorado Department of Education

2012 Audit Documentation Check List (At-Risk)

Below is a list of documentation each district must be prepared to provide at the start of their audit. It is recommended that this documentation be pulled together and reviewed by the district prior to accepting their Student October Count file submitted through the Automated Data Exchange (ADE). Please note that this is not intended to be an exhaustive list of all possible documentation.

Necessary Documents for all Students

Page Reference

- | | |
|---|------|
| <input type="checkbox"/> Application(s) for Free and Reduced Price School Meals
___ Prior year "carryover" application(s), if applicable
Note: Applications are required for <u>only</u> students who are identified as free lunch eligible | 4-5 |
| <input type="checkbox"/> FEDS Form(s) (if applicable) | 5 |
| <input type="checkbox"/> Official Direct Certification Match Report | 6 |
| <input type="checkbox"/> Migrant/Homeless/Runaway Reports
___ District Migrant List
___ Homeless/Runaway List | 4, 6 |

Note: Students must appear on one of these lists for the current school year in order for them to be reported as free-lunch eligible in the Student October data submission regardless of whether they are noted as such on the Application for Free and Reduced Price School Meals. Failure to provide these lists may result in the adjustment of the district's at-risk count.

Audit Team Contact Information

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It is recommended that courier services such as
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