

Student October 2014 At-Risk Count Resource Guide

September 2014

Division of School Finance - Field Analyst Support Team 201 E. Colfax Ave., Denver, CO 80203 (303) 866-6153 audit@cde.state.co.us

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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' eligibility for at-risk funding as outlined in the Public School Finance Act of 1994 (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 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 atrisk funding, the Field Analyst Support Team (FAST) of the Division of Public School Finance for the Colorado Department of Education conducts periodic compliance audits of each district's Student October Count data. FAST 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 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:

Current year:

- Direct Certification List
- Application for Free and Reduced Price School Meals
- Family Economic Data Survey
- District migrant, homeless, runaway and /or foster child lists.
- Head Start documented participation

Carryover documents

Absent current year documentation (Direct Certification, Free and Reduced Lunch Application, FEDS form, or migrant, homeless, foster, or runaway lists), a district may submit the student's prior year 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. When a new eligibility determination is made based upon current year documentation, the student's eligibility is updated, if appropriate.

State statute (Section 22-54-112(4), C.R.S.) requires every school to include the federal Application for Free and Reduced Price Meals (or the state Family Economic Data Survey form as appropriate) in its registration materials. The materials shall include an explanation that these documents will be used to determine whether the school is eligible for at-risk funding on behalf of the pupil and, by filling out the form, the parent is ensuring the district or school will receive at-risk funding which it is entitled.

Direct Certification

A student who qualifies to be on the direct certification match report, for the current school year, is automatically eligible for free lunch. A copy of the official direct certification match report for the current school year within 30 calendar days after the pupil enrollment count day or alternative count day is required for audit if the student was reported as free lunch eligible in the Student October Count 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 has indicated the date within 30 days following the pupil enrollment count day or alternative count day 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 has initialed or signed the addition.

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 audit as it relates to the 2014-2015 application that is available on the CDE website.

- 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 the appropriate liaises. For audit purposes, the district will need to provide copies of its homeless and/or migrant list.
- 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 a 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.
 - Foster, homeless, migrant and runaway status cannot be conveyed to other students.
 There may be an application with these indicators marked but income may still need to be used for other children on the application.
- Part 5: (This section is not relevant to the At-Risk audit.)
- Part 6: If Part 4 is completed and 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, including a signature and date from the parent/guardian, the district's at-risk count may be adjusted.
 - Current year application must be dated between July 1 of the current year and 30 calendar days following the pupil enrollment count day or alternative count day.
 - Applications approved 31 days or more following the pupil enrollment count day or alternative count day will not be acceptable for verification of free lunch eligibility as it is reported in the Student October data submission.
- The signature of the eligibility-determining official must be on all applications, including applications that have been denied. The date the eligibility determination was made must also be on the application.
- In the event an application is modified/changed by district staff 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.

Family Economic Data Survey

While the state Family Economic Data Survey form has historically been used only by districts or schools not participating in the federal child nutrition programs, it can now be used as an alternate data collection instrument in districts or schools that are operating under a federal Special Assistance Certification and Reimbursement Alternative, including the Community Eligibility Provision (CEP) or Provision 2. Therefore, the state Family Economic Data Survey form can be used to document eligibility for at-risk funding for districts or schools not participating in the child nutrition programs, participating in CEP, or participating in the Provision 2 program following their base year.

Questions regarding the Community Eligibility Provision (CEP) or Provision 2 should be directed to Julie Griffith at (303) 866-6759 or Griffith_j@cde.state.co.us

If a student is deemed "free lunch" eligible through the completion of a Family Economic Data Survey form, the student may be reported as such in the district's Student October Count data submission. The district must ensure that the form is filled out correctly and completely, as well as processed accordingly by the district. The guidelines for the At Risk audit as it relates to the 2014-2015 Family Economic Data Survey form are similar to those for the application described above.

- Must be signed and dated by an adult member of the household.
- Must include the names of <u>all</u> 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 have income.
- 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.
- Homeless, Migrant or Runaway: If an application is received with the H/M/R box checked, the District must confirm the appropriate liaises. For audit purposes, the district will need to provide copies of its homeless and/or migrant list.
- In the event an application is modified/changed by district staff 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.
- Current year forms must be dated between July 1 of the current year and 30 calendar days following the pupil enrollment count day or alternative count day.
- Forms approved 31 days or more following the pupil enrollment count day or alternative count day will not be acceptable for verification of free lunch eligibility as it is reported in the Student October data submission.

• The signature of the eligibility-determining official must be on all applications, including applications that have been denied. The date the eligibility determination was made must also be on the application.

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 <u>calendar</u> days following the pupil enrollment count day or alternative count day, and dated appropriately). This can also be indicated on the application.

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 <u>calendar</u> days following the pupil enrollment count day or alternative count day, and dated appropriately). This can also be indicated on the application.

Appendix A

Sample of the 2014-2015 Application for Free and Reduced Meals

2014-2015 Application for Free and Reduced Price School Meals (This form may be used only if participating in the federal Child Nutrition programs)

| Last Name | e(s) of Far | nily | | | iling Address, City, Zip | Code | | | - | | | Telephone Number |
|--|-------------------------|--|---------------------------------------|--|--|-------------------------------|--|-------------------|--|--------------|--|---|
| INSTE | RUCTIO | ONS: Using the instruction | on sheet | provided, complete the ar | pplication, sign you | ır nar | ne, and return application to | school | 1. | | | |
| Part students | 1. Studer s that are | the legal responsibility of a wel- | fare agend | school in the district; provide s y or court. If the student has I udent to the household section | NO INCOME, you MUS | T che | Check the foster child check box for ck the No Income box. If the stud ormation. | or all ent has | H: Ho M: M R: Ru | igranl | t | Part 2. Supplemental Nutrition Assistance Program (SNAP) /Food Distribution Program on Indian Reservations (FDPIR): |
| Foster No Child Income Student Name: Last, First School Grade H M R | | | | | | | | | Provide the name and case number for the | | | |
| | | | | | | | | | | | | person who receives benefits. (Enter information and skip to part 5) |
| \vdash | | | | | | | | | | | | Name: |
| \vdash | | | | | | | | | | | | Case Number: |
| | | | | | | | | | | | | Part 3. Other Source Eligibility: If any |
| | | | | | | | | | Ш | | Ш | child you are applying for is HOMELESS, MIGRANT, OR RUNAWAY, check the |
| | | | | | | | | | | | Ш | appropriate box to the left and call [your school, homeless liaison, migrant |
| Part 4. | | usehold members not listed ab students with income. | ove AND | List all c | urrent gross income | , and | check how often it was receiv | ed. | | | | coordinator at phone #] |
| | N | ame: Last, First | No Income | Earnings from work before deductions, or unemployment | Welfare, child suppo alimony | ort, | Pensions, retirement, Social Security, SSI, VA benefits | Other | | | | Part 5. MEDICAID AND/OR STATE CHILDREN'S HEALTH INSURANCE PROGRAM (SCHIP) |
| | | | | monthly bi-weekly weekly 2dmonth \$ | monthly | | monthly bi-weekly weekly 2x/month \$ | | nonthly reekly | | | The information provided in the application |
| | | | monthly bi-weekly weekly 2x/month \$ | □ monthly □ bi- □ weekly □ 2x/ | month | monthly bi-weekly 2x/month \$ | w | nonthly reekly | 20 | month | may be shared with Medicaid or SCHIP offices to seek enrollment of children into the | |
| | | | | monthly bi-weekly Loweekly 2x/month \$ | monthly bi-1 | month | monthly bi-weekly | | nonthly reekly | 20 | month | above programs. You are not required to consent to the disclosure of this information. |
| <u> </u> | | | | monthly bi-weekly Leading bi-weekly monthly bi-weekly | monthly bi- weekly 2x/ monthly bi- | month | monthly bi-weekly weekly 2x/month \$ monthly bi-weekly | ~ | nonthly reekly nonthly | 20 | month | this will not affect your student(s)' eligibility for school meals. |
| | | | | \$ weekly \bigsize 2x/month \\$ \bigsize monthly \bigsize 1x/month \\$ | monthly bi- | month | □ monthly □ bi-weekly □ monthly □ bi-weekly | D w | reekly (nonthly) | □ 2di | month | Your information WILL be shared unless |
| | | | 1- | \$ weekly \[\infty \ 2d\text{month} \\$ \] \[\begin{array}{c} \models \text{weekly} \\ \models \text{month} \\ \models \text{weekly} \end{array} | weekly = 2x/ | month weekly | weekly 2x/month \$ monthly bi-weekly | w | reekly (| 20 | month | you check the box below. □ Please do NOT share my |
| | | | - | \$ weekly □ 2x/month \$ □ monthly □ bi-weekly | weekly 2/l | weekly | weekly 2x/month \$ monthly bi-weekly | | reekty nonthly | □ bi-y | weekly | information with the Medicaid or SCHIP offices. |
| <u></u> | | | | \$ weekly 🗖 2x/month \$ | weekly 🗖 2x/ | month | s weekily ☐ 2x/month \$ | | reekly | 1 2xh | month | |
| An adu box. So | ilt househ ocial Sec | urity Number (Last 4 digits or | ication. If nly): XXX | Part 4 is completed, the adult - XX | do not have a Social S | ecurity | Number | | | | | nark the "I do not have a Social Security Number" |
| I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get federal funds based on the information I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted. Sign here: X | | | | | | | | | | | | |
| ************************************** | | | | | | | | | | | | |
| Annual Income Conversion: Weekly x 52; Bi-Weekly x 26; 2 Times per Month x 24; Monthly x 12 Total Income: Per Week, Bi-Weekly, 2x/Month, Month, Year Household size: Eligibility: Free Reduced: Denied: Income Categorically Eligible App Num.: Determining Official's Signature: Date: Withdrawn Date: | | | | | | | | | | | | |

Appendix B

Sample of the 2014-2015 Family Economic Data Survey

2014-2015 Family Economic Data Survey

| Last Name | (s) of Family | | Ma | iling Addres | ss, City, Zip Code | | | | - | | | Telephone Number | |
|---|--|---|--|--------------|---|---|--------------------------------------|---|--|-------|--|---|--|
| INSTRUCTIONS: Using the instruction sheet provided, complete the application, sign your name, date, and return application to school. Part 1. Student Information. List all students attending school in the district; provide school and grade information. Check the foster child check box for all students that are the legal responsibility of a welfare agency or court. If the student has NO INCOME, you MUST check the No Income box. If the student has income please add the student to the household section below and provide income information. | | | | | | | | | Part 2. Supplemental Nutrition Assistance Program (SNAP) /Food Distribution Program on Indian Reservations (FDPIR): | | | | |
| Foster Child | | t Name: l | ast, First | | | Grade No Income | | нм | | R | Provide the name and case number for the person who receives benefits. (Enter information and skip to part 5) | | |
| \vdash | | | | | | | | | \vdash | | Н | Name: | |
| | | | | | | | | | Н | | Н | Case Number: | |
| | | | | | | | | | | | | Dest 2 Other Course Flightlikes If our | |
| | | | | | | | | | | | | Part 3. Other Source Eligibility: If any child you are applying for is HOMELESS, | |
| \vdash | | | | | | | | | Ш | | Ш | MIGRANT, OR RUNAWAY, check the appropriate box to the left and call [your | |
| Part 4. l | ist all household members not listed ab | ove AND | . List all cu | rrent gros | s income, and | check how often it | was rec | eived. | | | Н | school, homeless liaison, migrant coordinator at phone #] | |
| | students with income. Name: Last, First | Earnings from work before deductions, or unemployment | deductions, or weirare, child support, | | | Pensions, retirement, Social Security, SSI, VA benefits | | | | | Part 5. MEDICAID AND/OR STATE CHILDREN'S HEALTH INSURANCE PROGRAM (SCHIP) | | |
| □ s □ weekly □ 2/dmorth s | | | | | monthly bi-weekly weekly 2x/month | eekly onth \$ | monthly bi-weekly weekly 2x/month | | | | The information provided in the | | |
| | | | monthly bi-weekly weekly 2x/month monthly bi-weekly | | monthly bi-weekly weekly 2x/month | monthly bi-w \$ weekly 2x/m | onth \$ | monthly bi-weekly weekly 2x/month monthly bi-weekly | | | month | application may be shared with Medicaid or SCHIP offices to seek enrollment of | |
| | | | \$ weekly _ 2x/month s | | monthly bi-weekly weekly 2x/month monthly bi-weekly | monthly bi-w \$ weekly 2dm monthly bi-w | onth \$ | w | nonthly reekly (nonthly) | 20 | month | children into the above programs. You are not required to consent to the disclosure of | |
| | | | \$ weekly □ 2d/month s | | weekly 2x/month | \$ weekly _ 2x/m | onth 5 | | reekly I | □ 2d | month | this information; this will not affect your student(s)' eligibility for school meals. | |
| \vdash | | 븝 | \$ weekly □ 2x/month s | | weekly 2x/month monthly bi-weekly | \$weekly 2x/m monthly bi-w | eekly | | reekly I | □ bi- | weekly | Your information WHLL be shared unless you check the box below. | |
| | | += | \$ | | weekly 2x/month monthly bi-weekly weekly 2x/month | \$ weekly 2\dr monthly bi-w \$ weekly 2\dr | eekly | | reekly I nonthly I reekly I | □ bi- | weekly | ☐ Please do NOT share my information with the Medicaid | |
| | | | monthly hi-weekly weekly 2x/month | | monthly bi-weekly weekly 2x/month | monthly bi-w | eekly | | nonthly reekly | □ bi- | weekly | or SCHIP offices. | |
| Part 6. Signature: (Adult MUST sign and date) An adult household member must sign and date the application. I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get federal funds based on the information I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted. Sign here: X Date: | | | | | | | | | | | | | |
| ************************************** | | | | | | | | | | | | | |
| Annual Income Conversion: Weekly x 52; Bi-Weekly x 26; 2 Times per Month x 24; Monthly x 12 [otal Income: Per _ Week, _ Bi-Weekly, _ 2x/Month, _ Month, _ Year Household size: Eligibility: Free_Reduced: Denied: Income _ Categorically Eligible App Num.: Determining Official's Signature: Date: Withdrawn Date: | | | | | | | | | | | | | |

Appendix C

INCOME ELIGIBILITY GUIDELINES

(Effective July 1, 2014 to June 30, 2015)

FOR SCHOOL USE ONLY. DO NOT DISTRIBUTE TO PARENTS

| Household Size | | Free | Guidelin | ies | | Reduced Guidelines | | | | | | | | |
|---------------------------------------|----------|---------|--------------|---------------|---------|--------------------|----------|---------|--------------|---------------|---------|--|--|--|
| | Yearly | Monthly | 2x/ Month | Bi- weekly | Weekly | | Yearly | Monthly | 2x/ Month | Bi- weekly | Weekly | | | |
| 1 | \$15,171 | \$1,265 | \$633 | \$584 | \$292 | | \$21,590 | \$1,800 | \$900 | \$831 | \$416 | | | |
| 2 | \$20,449 | \$1,705 | \$853 | \$787 | \$394 | | \$29,101 | \$2,426 | \$1,213 | \$1,120 | \$560 | | | |
| 3 | \$25,727 | \$2,144 | \$1,072 | \$990 | \$495 | | \$36,612 | \$3,051 | \$1,526 | \$1,409 | \$705 | | | |
| 4 | \$31,005 | \$2,584 | \$1,292 | \$1,193 | \$597 | | \$44,123 | \$3,677 | \$1,839 | \$1,698 | \$849 | | | |
| 5 | \$36,283 | \$3,024 | \$1,512 | \$1,396 | \$698 | | \$51,634 | \$4,303 | \$2,152 | \$1,986 | \$993 | | | |
| 6 | \$41,561 | \$3,464 | \$1,732 | \$1,599 | \$800 | | \$59,145 | \$4,929 | \$2,465 | \$2,275 | \$1,138 | | | |
| 7 | \$46,839 | \$3,904 | \$1,952 | \$1,802 | \$901 | | \$66,656 | \$5,555 | \$2,778 | \$2,564 | \$1,282 | | | |
| 8 | \$52,117 | \$4,344 | \$2,172 | \$2,005 | \$1,003 | | \$74,167 | \$6,181 | \$3,091 | \$2,853 | \$1,427 | | | |
| For each additional family member add | \$5,278 | \$440 | \$220 | \$203 | \$102 | | \$7,511 | \$626 | \$313 | \$289 | \$145 | | | |
| Error Prone Thresholds | \$1,200 | \$100 | \$50 | \$44 | \$24 | | \$1,200 | \$100 | \$50 | \$44 | \$24 | | | |

Appendix D

FAST Contact Information

201 E. Colfax Ave., Room 200 Denver CO 80203-1799 Fax (303) 866-6663

Scott Abbey - FAST Supervisor (303) 866-6153 abbey_s@cde.state.co.us

Shaheedah Chase - Field Analyst (303) 866-6880 chase_s@cde.state.co.us

Rebecca McRee - Field Analyst Coordinator (303) 866-6805 mcree_r@cde.state.co.us

> Melody Barnett - Field Analyst (303) 866-6804 barnett_m@cde.state.co.us

> Kharis Eppstein - Field Analyst (303) 866-6879 eppstein_k@cde.state.co.us

You may also send questions to: Field Support Team audit@cde.state.co.us or

Jennifer Okes Public School Finance Director (303) 866-2996 okes_j@cde.state.co.us