



COLORADO
Department of Education

2015 Student October At-Risk Count

Presented by:
Field Analyst Support Team
Office of School Finance

August 18, 2015

Pupil Enrollment Count Date

Each year all public school districts across the state of Colorado participate in the Student October Count data submission.

The data submitted:

- Is used to determine both per-pupil and at-risk funding for each district.
- Includes all district students who met the membership requirements as of the pupil enrollment count date.

For 2015/2016, the pupil enrollment count date is:

- Thursday, October 1, 2015 (unless the district has requested, and has been granted, an alternative count date for itself or any of its schools).

At-Risk Funding Consideration

While several factors come into play when determining a district's at-risk funding, a student's free and reduced lunch status as reported in the Student October Count data submission is the primary determination.

Valid lunch eligibility codes for the data submission include:

- 0 = Not eligible/ Paid
- 1 = Free lunch eligible
- 2 = Reduced priced lunch eligible

Only funded students reported as free lunch eligible are included in the count when determining at-risk funding.

At-Risk Count Audit

In an effort to ensure accurate reporting of those data fields associated with at-risk funding, the Field Analyst Support Team (FAST) of the Office of School Finance at CDE conducts periodic compliance audits of each district's Student October Count data.

Audits are conducted every 1 to 4 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 or current data submissions.

At-Risk Count Eligibility

The National School Lunch Program (NSLP) eligibility is:

- Used to determine if a student is eligible for free or reduced priced meals provided through the Child Nutrition Programs
- **Used to determine if a student is eligible for At-Risk funding through the Public School Finance Act**
- Used in determining funding for other programs, including Title I
- Potentially used in determining eligibility for fee waivers
- Overseen by the CDE Office of School Nutrition
- **Audited by the CDE Field Analyst Support Team**

At-Risk Count Eligibility Criteria

- Students may be categorically eligible for free meal benefits because they, or any household member, receive benefits through the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR), Temporary Aid to Needy Families (TANF)-State Diversion or Basic Cash Assistance (BCA) or because they qualify as homeless, runaway, migrant, are a foster child, or are enrolled in Head Start program.
- Students may be eligible for free or reduced meal benefits through the Application for Free and Reduced Price Meals or Family Economic Data Survey form.

Income Guidelines

- Students may be eligible for free or reduced meal benefits based upon the following income guidelines:

Household Size	Free Guidelines					Reduced Guidelines				
	Yearly	Monthly	2x/ Month	Bi-weekly	Weekly	Yearly	Monthly	2x/ Month	Bi-weekly	Weekly
1	\$15,301	\$1,276	\$638	\$589	\$295	\$21,775	\$1,815	\$908	\$838	\$419
2	\$20,709	\$1,726	\$863	\$797	\$399	\$29,471	\$2,456	\$1,228	\$1,134	\$567
3	\$26,117	\$2,177	\$1,089	\$1005	\$503	\$37,167	\$3,098	\$1,549	\$1,430	\$715
4	\$31,525	\$2,628	\$1,314	\$1,213	\$607	\$44,863	\$3,739	\$1,870	\$1,726	\$863
5	\$36,933	\$3,078	\$1,539	\$1,421	\$711	\$52,559	\$4,380	\$2,190	\$2,022	\$1,011
6	\$42,341	\$3,529	\$1,765	\$1,629	\$815	\$60,255	\$5,022	\$2,511	\$2,318	\$1,159
7	\$47,749	\$3,980	\$1,990	\$1,837	\$919	\$67,951	\$5,663	\$2,832	\$2,614	\$1,307
8	\$53,157	\$4,430	\$2,215	\$2,045	\$1,023	\$75,647	\$6,304	\$3,152	\$2,910	\$1,455
For each additional family member add	\$5,408	\$451	\$226	\$208	\$104	\$7,696	\$642	\$321	\$296	\$148
Error Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$1,200	\$100	\$50	\$44	\$24

At-Risk Count Eligibility

For the purposes of the at-risk count audit, districts must be prepared to provide documentation to support any funded student's free lunch eligibility status as reported in the data submission. Acceptable documentation includes:

- Direct Certification list/Match report
- Application for Free and Reduced Price Meals
- Family Economic Data Survey form
- District migrant, homeless, runaway or foster lists

At-Risk Count Audit Documentation

Beginning with the 2015/2016 school year, all current year documentation must be dated/received by the district on or before the pupil enrollment count date in order to be used for determining lunch eligibility for the Student October Count data submission.

Carryover Documentation

In the absence of current year documentation, the district may utilize carryover documentation evidencing free lunch eligibility if the pupil enrollment count date falls within the first 30 school days of the current school year.

For the 2015/2016 school year, in the event a district is unable to use the carryover documentation to evidence free lunch eligibility because the pupil enrollment count date does NOT fall within the first 30 school days, the district may request a variance waiver to extend the 30 day requirement as it relates to the at-risk count only. These requests must be submitted to the Commissioner of CDE no later than September 15, and should outline the reason for the waiver.

Direct Certification

Any student who appears on a district direct certification list, or match report, ran between July 1 and the pupil enrollment count date for the current school year, may be reported as free lunch eligibility in the Student October Count data submission. A copy of the direct certification list must be made available at the time of the at-risk count audit in order to evidence free lunch eligibility.

It is recommended that district nutrition services units run direct certification uploads monthly after each new file is available, and that in addition to the required nutrition uploads, districts should also run a direct certification list on the pupil enrollment count date (10/1).

Direct Certification- Extended Eligibility

For students who were not listed on the direct certification list but who reside or belong to the same household as a student who was listed, eligibility may be extended to the student. The district must have documentation evidencing the following:

- The date extended eligibility was granted
- The initials/name of the district staff member who granted the extended eligibility
- The name of the household member who appears on the direct certification list
- The date of direct certification list was ran
- A copy of the direct certification list

Applications for Free and Reduced Price School Meals

If a student is identified as free lunch eligible through the completion of an application, the student may be reported as such in the data submission. The district will need to be prepared to provide a copy of this application at the time of audit.

For online applications, the district will need to provide a copy of the data submitted in the online application including appropriate evidence of signature (usually an IP address) and the date the application was submitted/received.

Family Economic Data Survey (FEDS) Form

The state FEDS form should be used to document free lunch eligibility for at-risk funding for districts or schools who meet one of the following criteria:

- Are NOT participating in the child nutrition program
- Who ARE participating in CEP
- Who ARE participating in the Provision 2 program following their base year

If a student is identified as free lunch eligible through the completion of a FEDS form, the student may be reported as such in the data submission. The district must be prepared to provide a copy of the document at the time of the audit.

Categorical Eligibility Determinations

If a student is identified as any of the following on or before the pupil enrollment count date, then the student may be reported as free lunch eligible in the data submission:

- Foster Children
- Migrant Students
- Homeless or Runaway Students

Students may be identified as such on either the Application for Free and Reduced Priced School Meals, the FEDS form, or on a district list. The district must be prepared to provide the applicable documentation evidencing the determination at the time of audit to support the student's free lunch status.

Special Assistance Certification and Reimbursement Alternatives

- The USDA has developed alternative approaches for certification and reimbursement for the Child Nutrition Programs, including:
 - Community Eligibility Provision (CEP)
 - Provision 2
- These provisions eliminate or reduce the administrative burden of collecting eligibility documentation and simplifies the counting and claiming procedures for reimbursement of school meals.

Community Eligibility Provision

- There has been some confusion about CEP and the October Count data submission. Participation in CEP does not change the October Count data submission requirements.
 - Although all students at a CEP participating school or district will receive free meals, the students' eligibility still determines the coding for the October Count data submission.
 - Therefore, all students at a CEP participating school or district should not be coded as 01 Free Lunch Eligible.
 - A CEP participating school or district will have some students coded as 00 Not Eligible, some students coded as 01 Free Lunch Eligible, and some students coded as 02 Reduced Lunch Eligible.

At-Risk Count Documentation and Processing

- Districts must retain all required documentation until audited by CDE or until five years from the certification due date (November 10), whichever comes first.
- The food service fund cannot be used to process documentation not associated with child nutrition programs.
- If students appear on a direct certification list and on an application, direct certification takes precedence. They are counted for nutrition purposes under direct certification and not under applications.
- Documentation to support eligibility determinations varies depending upon participation in the Child Nutrition Programs, and participation in CEP or Provision 2.

Documentation Matrix

	At-Risk Funding Documentation ¹	Child Nutrition Programs Documentation ¹
Participating in Child Nutrition Programs (not through an alternative provision)	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
Participating in Community Eligibility Provision (CEP) Base Year	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
Participating in Provision 2 Base Year	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
CEP/Provision 2 Years 2, 3, 4 for NEWLY ENROLLED students after Base Year	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	None
Years 2, 3, 4 for students documented in Base or Subsequent Year	Evidence that the students documented in base year remain included in the district's pupil enrollment ²	None
Not Participating in Child Nutrition Programs	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	Not Applicable

1. Pursuant to 1 CCR 301.39 2254-R-8.02, districts should retain all required documentation in a central location until audited by the Department or until five years from the certification due date (November 10) whichever comes first.

2. The district's food service fund cannot be used for any processing or maintenance of documentation not associated with eligibility for the child nutrition programs as it is an unallowable cost. Other district resources must be used. If the district wishes to have food service personnel process the surveys, the food service fund must be reimbursed for the cost of this processing.



For More Information

- Eligibility Manual for School Meals, Part 8
<http://www.fns.usda.gov/cnd/Guidance/EliMan.pdf>
- 7 CFR 245.6a (Verification Requirements)
- 7 CFR 245.9 (Special Assistance Certification and Reimbursement Alternatives)
- Section 22-54-112(4), C.R.S. and 1 CCR 301.39 2254-R-6.00
- More information on Free and Reduced Lunch, verification, and the application process can be found at:
<http://www.cde.state.co.us/nutrition/nutrfreeandreducedmaterials.htm>
- More information on the documentation requirements can be found at: <http://www.cde.state.co.us/cdefinance/auditunit.htm>

Contacts

- For questions on documentation to evidence at-risk eligibility for School Finance purposes and CDE audits:
 - Rebecca McRee mcree_r@cde.state.co.us (303) 866-6805
 - Jennifer Okes okes_j@cde.state.co.us (303) 866-2996
- For questions on free and reduced lunch eligibility, verification, and the application process:
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