

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**

Detailed Agenda

- 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 districtreported 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 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)



Student October Count Day 2023



The 2023 pupil enrollment count date will be:

Monday, October 2, 2023

		Sep	tem	ber		
Sυ	Мо	Tυ	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

		0	ctob	er		
Sυ	Мо	Tυ	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								
Sυ	Мо	Tυ	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 <u>or</u> 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, reducedprice, 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 Guidelir	nes			
Household Size	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	\$18,954	\$1,580	\$790	\$729	\$365
2	\$25,636	\$2,137	\$1,069	\$986	\$493
3	\$32,318	\$2,694	\$1,347	\$1,243	\$622
4	\$39,000	\$3,250	\$1,625	\$1,500	\$750
5	\$45,682	\$3,807	\$1,904	\$1,757	\$879
6	\$52,364	\$4,364	\$2,182	\$2,014	\$1,007
7	\$59,046	\$4,921	\$2,461	\$2,271	\$1,136
8	\$65,728	\$5,478	\$2,739	\$2,528	\$1,264
For each additional family member add	\$6,682	\$557	\$279	\$257	\$129
Error-Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24

Reduced-Pr	ice Guidelin	ies		
Yearly	Monthly	2x/Month	Every Other Week	Weekly
\$26,973	\$2,248	\$1,124	\$1,038	\$519
\$36,482	\$3,041	\$1,521	\$1,404	\$702
\$45,991	\$3,833	\$1,917	\$1,769	\$885
\$55,500	\$4,625	\$2,313	\$2,135	\$1,068
\$65,009	\$5,418	\$2,709	\$2,501	\$1,251
\$74,518	\$6,210	\$3,105	\$2,867	\$1,434
\$84,027	\$7,003	\$3,502	\$3,232	\$1,616
\$93,536	\$7,795	\$3,898	\$3,598	\$1,799
\$9,509	\$793	\$397	\$366	\$183
\$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 prioryear eligibility must be maintained

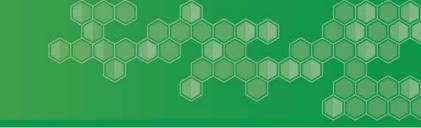


Carryover Variance Waiver

- 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 reducedprice lunch eligible in the Student October Count data submission.



Notice: Changes to At-risk Funding Calculations Beginning in 2024-2025

- 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) <u>OR</u> categorical eligibility (foster, homeless, migrant, etc.); <u>AND</u>
 - 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





School Auditing Office At-Risk Count Resources

Website:

https://www.cde.state.co.us/cdefinance/auditunit atrisk fr eeandreduced

At-Risk Count SCHOOL AUDITING OFFICE At-Risk Count

2023 Count Date: Monday, October 2

Summary

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, including information regarding students' funding eligibility and lunch eligibility ("Free," "Reduced," or "Paid") as outlined in the Public School Finance Act of 1994 (Section 22-54-101, C.R.S.). The Colorado Department of Education collects these 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 at-risk funding, the School Auditing Office of the School Finance Unit for the Colorado Department of Education conducts periodic compliance audits of each district's student October count data, including a review of documentation to support free and reduced-price lunch eligibility.



Some forms recommended by the School Auditing Office may contain personally identifiable information of students and districts should take additional precautions. Local education agencies must use secure means when sending Personally Identifiable Information (PII) to CDE. If transferring PII between districts, schools, or with other parties, CDE strongly recommends that districts use a secure method of transferring PII between districts, schools, or with other parties (for example, a secure file sharing tool like Syncplicity, or including the PII in a passwordprotected document). For more information, please visit the <u>Data Privacy and Security</u> website or contact <u>CDE's Data Privacy Office</u>.

Resource Guides

2023-2024 At-Risk Count Audit Resource Guide UPDATED 06/30/23

Prior Audit Resource Guides

Prior versions of the Audit Resource Guide can be found by clicking

Supplemental Resources

- · At-Risk Data Validation Best Practices (PDF)
- Family Economic Data Survey for 2023-2024 English (.docx)
- . Family Economic Data Survey for 2023-2024 Spanish (.docx)
- · Family Economic Data Survey Instructions 2023-2024 -English (.docx)
- . Family Economic Data Survey Instructions 2023-2024 -

Resource Guide:

https://www.cde.state.co.us/cdefinance/2022 atrisk audit resource guide



Fiscal Year 2023-2024

Colorado Public School Districts, Charter Schools, Charter School Collaboratives, Charter School Networks, The Charter School Institute (CSI) and Colorado Boards of Cooperative Educational Services (BOCES)

By: Colorado State Board of Education School District Operations Division

Susana Córdova Jennifer Okes

Commissioner of Education Chief School Operations Officer Executive Director of School Finance and Grants

Amy Carman

School Auditing Office

Rebecca McRee Supervisor Jessica Oxton Auditor Tabitha Tyree Auditor Adam Van Alstvne Auditor

Effective July 1, 2023

201 E. Colfax Ave., Denver, CO 80203: 303-866-6600: http://www.cde.state.co.us

Colorado Revised Statutes http://www.lexisnexis.com/hottopics/colorado/ Code of Colorado Regulations http://www.sos.state.co.us/CCR/Welcome.do



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 <u>FEDS</u> forms, review the additional "<u>Online Signature Guidance</u>":
 - (http://www.cde.state.co.us/cdefinance/school_auditing_online_signatures)

Audit Documentation

- <u>Pupil Count Document Checklist (PDF)</u>
- Online Signature Guidance (PDF)



Application- Template

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

EP 1 List ALL Students' atten	ding [Insert Dis	strict Name] (if more spaces are :	required for a	additional nam	es, attach anothe	r sheet of paper	•)
Student's First Name	MI	Student's Last Nan	ne		Date	4-	Foster Head
Student's I'llst Ivalile		Stoccit 3 Dast Ivan		M M D	D Y Y Gra	\neg \mid \setminus	Child Start Runaway Homeless Migrar
						Check all that	
						apply. Read How to Apply for Free and	
	\pm					Reduced-)HHHHH
						Price School Meals for	
						more information.	
	+ $+$ $+$					≓ [/	
EP 2 If any household member	rs (including yo	u) currently receive assistance fr	om any of the	e following pro	grams: SNAP, TA	ANF or FDPIR	list the case number below.
lemental Nutrition Assistance Program							
IF/Colorado Works – Basic Cash Assi							
am on Indian Reservations (FDPIR).	Provide case nun	aber and skip to Step 4.	SNAP Ca	ase Number	TANF Case	Number	FDPIR Case Number
EP 3 Report income for ALL b	ousehold mem	bers (skip this step if you provid	ed a case nun	nber in STEP 2)		T D1 IIC Cube I (dilice)
•		, , , , , , , , , , , , , , , , , , ,			How Often?		
Student Income		all atradauta listed above	Student In	come Vietky SHViet	dy 2x Worth Worthly Annuals	4	
se include the TOTAL income, if		y all students listed above.	\$		000		
All Other Household Members (inc						J	
		ted in Step 1 (including yourself) even					
TAL GROSS INCOME (BEFORE T	TAXES AND OT	HER DEDUCTIONS) for each source					write '0'. If you enter '0' or leav
TAL GROSS INCOME (BEFORE ? fields blank, you are certifying that th	TAXES AND OT	HER DEDUCTIONS) for each source	e in whole dolla	ars only. If they do		e from any source	write '0'. If you enter '0' or leav
TAL GROSS INCOME (BEFORE T	FAXES AND OT ere is no income to	HER DEDUCTIONS) for each source report.		ars only. If they do	not receive income		write '0'. If you enter '0' or leav How Often?
TAL GROSS INCOME (BEFORE T fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to	HER DEDUCTIONS) for each source to report. How Often?	e in whole doll: Public Assistanc	ars only. If they do	o not receive income w Often?	e from any source. Pensions/Retiren	write '0'. If you enter '0' or leav How Often?
TAL GROSS INCOME (BEFORE T fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to Earnings from	HER DEDUCTIONS) for each source to report. How Often?	Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions/Retiren	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE 7 fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to Earnings from	HER DEDUCTIONS) for each source to report. How Often?	e in whole doll: Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions/Retiren	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE 7 fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to Earnings from	HER DEDUCTIONS) for each source or report. How Often? Work Weekly B-Weekly Za Morth Monthly Annually	Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions/Retiren	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE 7 fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to Earnings from	HER DEDUCTIONS) for each source or report. How Often? Work Weekly B-Weekly Za Morth Monthly Annually	Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions Retiren All Other Incom	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE 7 fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to	HER DEDUCTIONS) for each source or report. How Often? Work Weekly B-Weekly Za Morth Monthly Annually	Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions/Retiren	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE) fields blank, you are certifying that the se of All Other Household Members and Last)	FAXES AND OT ere is no income to Earnings from S S S S S S S S S S S S S S S S S S S	HER DEDUCTIONS) for each source or report. How Often? Work Weesly Bevieted 2 suborb Monthly Annually	e in whole dollar Public Assistanc Child Support/A	ars only. If they do	o not receive income w Often?	Pensions Retiren All Other Incom	write '0'. If you enter '0' or leav How Often?
FAL GROSS INCOME (BEFORE 7 fields blank, you are certifying that the ses of All Other Household Members	FAXES AND OT ere is no income to Earnings from S S S S Last f	HER DEDUCTIONS) for each source or report. How Often? Work Weekly B-Weekly Za Morth Monthly Annually	e in whole dolling Public Assistanc Child Support A S S S S S S S S S S S S S S S S S S	ars only. If they do	o not receive income w Often?	Pensions/Retiren All Other Income S S S S S	write '0'. If you enter '0' or leav How Often?
TAL GROSS INCOME (BEFORE 1 fields blank, you are certifying that the set of All Other Household Members and Last) tal Household Members adents and Adults from Steps 1 and 3)	FAXES AND OT ere is no income to Earnings from \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	HER DEDUCTIONS) for each source or report. How Often? Work Weenly Belifered 22 Month Monthly Annually One of the control of	Public Assistanc Child Support A S S S S Out (SSN) or n has been complete	ars only. If they do	o not receive income w Often? St Month Monthly Annually St Month Monthly Annually St	Pensions Retiren All Other Incom S S Check	Write '0'. If you enter '0' or leav How Often? Weelly E-Misethy 2x Morth Morthly Annu
TAL GROSS INCOME (BEFORE 1 fields blank, you are certifying that the set of All Other Household Members and Latt) tal Household Members addents' and Adults from Steps 1 and 3) EP 4 Contact information and formation for and formation foat all information on this application.	Earnings from S S Last f SSN" adult signatur tion is rue and that all	HER DEDUCTIONS) for each source or report. How Often? Work Weekly Belificated 22 Month Monthly Annually or the source of the s	Public Assistanc Child Support A S S S S S Der (SSN) or n as been complete plication to:	ars only. If they do the limony limo	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retiren All Other Incom S S Check Check	write '0'. If you enter '0' or leav How Often? Wheely BH/Seldy 2x/Morth Morthly Annu Wheely BH/Seldy 2x/Morth Morthly Annu Description of the seldy and the
TAL GROSS INCOME (BEFORE 1 fields blank, you are certifying that the set of All Other Household Members and Latt) tal Household Members addents' and Adults from Steps 1 and 3) EP 4 Contact information and formation for and formation foat all information on this application.	Earnings from S S Last f SSN" adult signatur tion is rue and that all	HER DEDUCTIONS) for each source or eport. How Often? Work Weesly Bevietely 2x Month Monthly Annually	Public Assistanc Child Support A S S S S S S S S S S S S S S S S S S S	ars only. If they do the limony limo	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retiren All Other Incom S S Check Check	write '0'. If you enter '0' or leav How Often? Wheely BH/Seldy 2x/Morth Morthly Annu Wheely BH/Seldy 2x/Morth Morthly Annu Description of the seldy and the
tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and to growing that information and to growing that information and to growing the falls information, my children may be given false information, my children may be	Earnings from Earnings from S S Last f SSN" Ladult signatur lore meal benefitz, and I	HER DEDUCTIONS) for each source or report. How Often? Work weesty Betweesty Ze Moorn Monthly Accounty Our digits of Social Security Numb of adult signing this form only if Step 3B b e. Mail signed and completed app theome is reported. I understand that this informancy be prosecuted under applicable State and F	Public Assistanc Child Support A S S S S Our (SSN) or n has been complete plication to: attention is given in con- celeral lane. CO	ars only. If they do Horizant	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retiren All Other Incom S Check Address at school officials may	write '0'. If you enter '0' or leav How Often? Weetly E-Weetly In Morth Morthly Annu Weetly E-Weetly In Morth Morthly Annu Down If no SSN
tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and the formation on this applicationship for give fails information, my children may be	Earnings from S S Last f SSN" adult signatur tion is rue and that all	HER DEDUCTIONS) for each source or report. How Often? Work Weekly Belificated 22 Month Monthly Annually or the source of the s	Public Assistanc Child Support A S S S S S S S S S S S S S S S S S S S	ars only. If they do the limony limo	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retiren All Other Incom S Check Address at school officials may	write '0'. If you enter '0' or leav How Often? Wheely BH/Seldy 2x/Morth Morthly Annu Wheely BH/Seldy 2x/Morth Morthly Annu Description of the seldy and the
TAL GROSS INCOME (BEFORE 'fields blank, you are certifying that the se of All Other Household Members and Last) tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and the (promise) that all information on this applications by give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information and the property gives a property give false information and the property gives give the property gives a property give a property gives a property gives a property gives a property give given the property gives given and the property gives give given the property gives given the property gives given the property gives given the property gives give given the property gives give given the give	Earnings from Earnings from S S Last f SSN" Ladult signatur lore meal benefitz, and I	HER DEDUCTIONS) for each source or report. How Often? Work weesty Betweesty Ze Moorn Monthly Accounty Our digits of Social Security Numb of adult signing this form only if Step 3B b e. Mail signed and completed app theome is reported. I understand that this informancy be prosecuted under applicable State and F	Public Assistanc Child Support A S S S S Our (SSN) or n has been complete plication to: attention is given in con- celeral lane. CO	ars only. If they do Horizant	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retiren All Other Incom S Check Address at school officials may	write '0'. If you enter '0' or leav How Often? Weetly E-Weetly In Morth Morthly Annu Weetly E-Weetly In Morth Morthly Annu Down If no SSN
tal Household Members tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and for formits) fact all information on this applications by give failse information, my children may lead to be a failed by the failse information, my children may lead to be a failed by the failse information, my children may lead to be a failed by the failse information, my children may lead to be a failed by the failse information on this application of the failse information my children may lead to be a failed by the failse information my children may lead to be a failed by the failse information my children may lead to be a failed by the failse information my children may lead to be a failed by the failse information my children may lead to be a failed by the	Earnings from S S Last f SN'' Ladult signatur tion is true and that all the meal benefits, and I pt # or Lot #	HER DEDUCTIONS) for each source or report. How Often? Work weesty Betweesty Ze Moorn Monthly Accounty Our digits of Social Security Numb of adult signing this form only if Step 3B b e. Mail signed and completed app theome is reported. I understand that this informancy be prosecuted under applicable State and F	Public Assistanc Child Support A S S S S Our (SSN) or n has been complete plication to: attention is given in con- celeral lane. CO	ars only. If they do the document of the docu	o not receive income av Often? Salorin Monthly Annually Salorin Monthly Annually	Pensions Retirent All Other Income S S S S S S S S S S S S S S S S S S S	write '0'. If you enter '0' or leav How Often? Weetly E-Weetly In Morth Morthly Annu Weetly E-Weetly In Morth Morthly Annu Down If no SSN
TAL GROSS INCOME (BEFORE 'fields blank, you are certifying that the se of All Other Household Members and Last) tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and the (promise) that all information on this applications by give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information, my children may keep the property give false information and the property gives a property give false information and the property gives give the property gives a property give a property gives a property gives a property gives a property give given the property gives given and the property gives give given the property gives given the property gives given the property gives given the property gives give given the property gives give given the give	Earnings from S S Last f SN'' Ladult signatur tion is true and that all the meal benefits, and I pt # or Lot #	HER DEDUCTIONS) for each source or report. How Often? Work Weesly E-Weesly Ze Month Monthly Annually	Public Assistanc Child Support A S S S S Our (SSN) or n has been complete plication to: attention is given in con- celeral lane. CO	ars only. If they do the document of the docu	Do not receive income as Often? 2x Month Monthly Annually	Pensions Retirent All Other Income S S S S S S S S S S S S S S S S S S S	write '0'. If you enter '0' or leav How Often? Wiestly BH/Vestly ZxMorth Morthly Annu Wiestly BH/Vestly ZxMorth Morthly Annu Down of the Common of the Com
TAL GROSS INCOME (BEFORE is fields blank, you are certifying that the se of All Other Household Members and Last) tal Household Members addents and Adults from Steps 1 and 3) EP 4 Contact information and forgrowing that all information on this applicationable give false information, my children may be alling Address or PO Box Home or Cell Phone Number DP 5 Release of Information will be use to make the second of this application will be used.	FAXES AND OT ere is no income to Earnings from S S S S S S S S S S S S S S S S S S S	HER DEDUCTIONS) for each source or eport. How Often? Work Weesly Betweesty 2x Month Monthly Annually Services of the Company	Public Assistanc Child Support A S S S S S S S S S S S S S S S S S S S	ars only. If they do Horeigness in the second seco	Do not receive income No Often? Salvorth Monthly Annually Salvorth Month	Pensions Retirent All Other Income S S S S S S S S S S S S S S S S S S S	write '0'. If you enter '0' or leav How Often? Wheely BHISESS 2x Morth Morthly Annu Wheely BHISESS 2x Morth Morthly Annu Wheely BHISESS 2x Morth Morthly Annu Down if no SSN Down if no SSN Email Address Today's Date are eligible to receive free or reduced-pri
tal Household Members et al Household Members ad Latt) tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and ft (gromite) that all information on this applications total give failse information, my children may le talling Address or PO Box Home or Cell Phone Number EP 5 Release of Information committion provided on this application with es chooling to the service of the servic	Earnings from Earnings from S Last f SSN" adult signatur tion is true and that all the meal benefits, and I pt. # or Lot # SIGNATURE of ed in conjunction with s sistict for purposes of w	HER DEDUCTIONS) for each source or report. How Often? Work weenly Betteenly 2s Month Monthly Annually or the source of the sou	Public Assistanc Child Support/A S S S S S S S S Corr (SSN) or n as been complete plication to: "CO State State th Medicaid or State difen) might otherw	ars only. If they do the dot of	Do not receive income av Often? 2x Month Monthly Annually 2x Monthly	Pensions Retirent All Other Income S S S S S S S S S S S S S S S S S S S	write '0'. If you enter '0' or leav How Often? Wheely BHISESS 2x Morth Morthly Annu Wheely BHISESS 2x Morth Morthly Annu Wheely BHISESS 2x Morth Morthly Annu Down if no SSN Down if no SSN Email Address Today's Date are eligible to receive free or reduced-pri
tal Household Members ed last) tal Household Members adents' and Adults from Steps 1 and 3) EP 4 Contact information and fy growing in the all information and in the property give false information, my children may be sailing Address or PO Box Address or PO	Earnings from Earnings from S Last f SSN" adult signatur tion is true and that all the meal benefits, and I pt. # or Lot # SIGNATURE of ed in conjunction with s sistict for purposes of w	HER DEDUCTIONS) for each source or report. How Often? Work weenly Betteenly 2n Month Monthly Annually or the source of the sou	Public Assistanc Child Support/A S S S S S S S S Corr (SSN) or n as been complete plication to: "CO State State th Medicaid or State difen) might otherw	ars only. If they do Hot Imony Viewy Envises: A ST School/I Insert School/I Insert School/I Insertion with the receip Zip Code Printed Children's Health Insurance of the sequired to pay, there dunless you check	Do not receive income av Often? 2x Month Monthly Annually 2x Monthly Annua	Pensions Retirent All Other Income S S S S S S S S S S S S S S S S S S S	write '0'. If you enter '0' or leav How Often? Ween' How Often? Annual Property Annual Propert



Family Economic Data Survey (FEDS) Form- Template

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

STEP 1 List all student's attending [Insert District Name] (if more spaces are required for additional names, attach another sheet of paper) State Proceeding Proceeding Proceeding Proceeding Proceded Proce							
Student's First Name	MI	Student's Last Name	No Birth L	ATC Child Start Runaway Homeless Migrant			
STEP 2 If household members (in pplemental Nutrition Assistance Program 'ANF/Colorado Works – Basic Cash Assistance groups or Indian Reservations (FDPIR). Program on Indian Reservations (FDPIR).	(SNAP), Tempo tance or State D	orary Assistance for Needy Families iversion), or Food Distribution		Check all that apply. Read Pederal Conomic Data Survey Intructions Instructions Instructions for more information. TANF, or FDPIR list the case number below.			
Persytines as for ALL by	washald maml	pers (Skip this step if you provided a c		F Case Number FDPIR Case Number			
STEP 3 Report income for ALL ho	usenota mem)	ers (Skip this step if you provided a c	case number in SIEP2) How Often?				
BEFORE TAXES AND OTHER DEDU re certifying that there is no income to repo	in Step 1 (inclu CTIONS) for e ort.	ding yourself) even if they do not receive ach source in whole dollars (no cents) only How Often?	7. If they do not receive income from any How Often?	ed, if they do receive income, report TOTAL GROSS source, write '0'. If you enter '0' or leave any fields blank, you How Often? Pensions Retirement			
Tames of Other Household Members (First and I	¬.┌─ -		Child Support/Alimony Weekly BH/Veekly 2x Month Mon	All Other Income			
	s	<u> </u>		5 0 5			
	s						
				0 0 0 0 0 0			
	s			0000000			
	="}=						
	s			s 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
	s			5 0 5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
FEP 4 Contact information and certify (promise) that all information on this survey is	adult signatu	re. Mail signed and completed applications is reported I understand that this hybraution is	given in connection with the receipt of Federal, Sta	e, and/or Local Education Program funds, and that school officials may verify			
FEP 4 Contact information and certify (promise) that all information on this survey is	adult signatu	re. Mail signed and completed applications is reported I understand that this hybraution is	given in connection with the receipt of Federal, Sta he district/school may lose funding, and I may be pr	e, and/or Local Education Program funds, and that school officials may verify			
TEP 4 Contact information and certify (promise) that all information on this survey is teck) the information. I am aware that if I purposely g	adult signatu	re. Mail signed and completed applications is reported I understand that this hybraution is	given in connection with the receipt of Federal, Sta he district/school may lose funding, and I may be pu CO	e, and/or Local Education Program funds, and that school officials may verify			
TEP 4 Contact information and certify (promise) that all information on this survey is teck) the information. I am aware that if I purposely g	S S S S S S S S S S S S S S S S S S S	s.	given in connection with the receipt of Federal, Sta he district/school may lose funding, and I may be pr	e, and/or Local Education Program funds, and that school officials may verify osecuted under applicable State and Federal laws."			
TEP 4 Contact information and certify (promise) that all information on this survey is tack) the information. I am aware that if I purposely g Mailing Address or PO Box A Phone	s s s s s s s s s s s s s s s s s s s	s.	given in connection with the receipt of Federal, Sta he district/school may lose funding, and I may be pu CO	e, and/or Local Education Program funds, and that school officials may verify osecuted under applicable State and Federal laws: " Email Address			
Certify (promise) that all information on this survey it heak) the information. I am aware that if I purposely if Mailing Address or PO Box A Phone TEP 5 Release of Information	adult signatu time and that all in tive false information upt # or Lot #	S. S	given in connection with the receipt of Federal, Sur he district/school may loss funding, and I may be pi CO Zip Code Printed First and Last	e, and/or Local Education Program funds, and that school officials may verify osecuted under applicable State and Federal laws." Email Address			



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 nonparticipating sites, that Application can be used to determine lunch eligibility in Student October for all listed students
- Use FEDS forms when school sites:
 - Are <u>NOT</u> 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 <u>Title I, Part C</u> 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 <u>Regional Migrant Liaison</u>: 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 <u>MKV Liaison</u>: 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 <u>CWEL</u>: 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 <u>cannot</u> 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

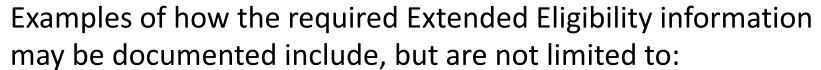


Extended Eligibility Documentation

- 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)
 - Basis of extension (add siblings form/same address/ application/FEDS)



Extended Eligibility





- 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</u> form, 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 not 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/



Documentation Retention



- 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



Annual Checks for District Staff

- Download & use the current year's <u>At-Risk Audit</u> <u>Resource Guide</u>
 - 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 reducedprice applications
- Update all software for the current/new school year
 - Use the "<u>Start of Year Checklist</u>" for free and reducedprice lunch software systems
 - https://www.cde.state.co.us/nutrition/softwarechecklist



Data Validation

- Know which schools are:
 - Participating in the National Lunch Program (NSLP)
 - Participating in CEP or Provision 2
 - 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)
 - 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



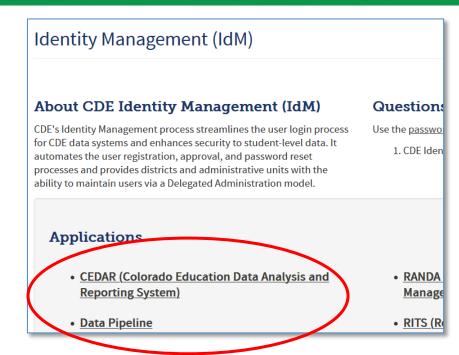
At the district and school levels, verify the following:

- 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 <u>IdM</u> or the <u>Data</u> <u>Pipeline</u> 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 <u>CEDAR/COGNOS Report Guide</u>
 - https://www.cde.state.co.us/data pipeline/studentoctoberreportdef initions



Data Validation: CEP and Provision 2 considerations

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



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

Email: <u>audit@cde.state.co.us</u>

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





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



