

# At-Risk Eligibility Reporting Tasks & Considerations

---

## Timeline & Tasks

---

### July – September

---

- Training & Resource Updates
  - Download and review the [2025 At-Risk Count Audit Resource Guide](#)
  - Attend [School Auditing Office](#) and [Data Pipeline](#) trainings
- Collect Eligibility Information
  - Distribute and process Applications, Combo forms, and/or FEDS forms
  - Run a direct certification monthly
  - Ensure nutrition software is up to date with current year information (i.e. income guidelines)
  - Calculate the USDA 30-day carryover expiration date
    - If the USDA 30-day carryover expiration date lapses prior to the pupil enrollment count date (10/1), identify students with no current year documentation evidencing **any** lunch status. If you have prior year documentation for these students showing free or reduced-price lunch eligibility, you may use that eligibility status for at-risk reporting purposes.
      - For CEP sites, organizations may use the status from the **best** document within the CEP cycle for a student's at-risk eligibility status.
- Data & Reporting
  - Obtain census block data after collecting and verifying physical addresses for all students
    - Note: Use the [Geocoder Tool](#) or your organization's GIS as needed
  - Begin populating the [At-Risk Interchange File](#)
- Submit the [At-Risk Count Questionnaire](#) by 9/15/2025

### October

---

- Training & Resource Updates
  - Attend [School Auditing Office](#) and [Data Pipeline](#) trainings
- Data & Reporting
  - Validate reported at-risk eligibility data
  - Submit the [At-Risk Interchange File](#) via Data Pipeline

### November & December

---

- Data & Reporting
  - Conduct final validation of reported at-risk eligibility data by 11/10/2025
  - Submit the [At-Risk Interchange File](#) via Data Pipeline before October Snapshot can be generated by 11/10/2025

## January – June

---

- Training & Resource Updates
    - Attend [School Auditing Office](#) and [Data Pipeline](#) trainings
  - Provide audit documentation to CDE upon request
- 

## Notes & Considerations

---

### At-Risk Documentation

---

Every student has an at-risk eligibility status separate from their ability to eat for free and whether their school/site offers meals. This at-risk reporting eligibility comes from the processing of direct certification matches, other categorical liaison lists, Applications, Combination forms, and/or FEDS forms. CDE uses this at-risk status eligibility to calculate at-risk funding for organizations and other data processes.

Every student has an at-risk eligibility status separate from their ability to eat for free and whether their school/site offers meals. This at-risk reporting eligibility comes from the processing of direct certification matches, other categorical liaison lists, Applications, Combo forms, and/or FEDS forms. CDE uses this at-risk status eligibility to calculate at-risk funding for organizations and other data processes.

All schools/sites should use the following documentation when establishing student eligibility for free or reduced-price lunch regardless of CEP status or participation in USDA programs:

- Complete direct certification match lists, including extended eligibility
- Liaison lists for categorical eligibility (foster, migrant, homeless or runaway based eligibility)

When collecting household income data to establish at-risk funding eligibility, it is the responsibility of organizations that participate in USDA programs to ensure that the appropriate form is provided to families.

The purpose of the Family Economic Data Survey (FEDS) is to provide an alternative way for districts to collect information needed to determine student lunch eligibility status based on income when neither the Application for Free and Reduced-Price School Meals nor the Combo form is appropriate.

**Note:** Sites that operate under an SFA different than that of their district/BOCES should establish a process to ensure eligibility statuses are being updated effectively between the SFA and the district/BOCES.

### Validating Reported At-Risk Data

---

All organizations should establish processes to validate reported at-risk data regardless of participation in a USDA program. Validation processes should include cross-referencing reported eligibility with the following:

- Complete direct certification lists from July 1 - pupil enrollment count date
- Liaison lists for categorical eligibility from July 1 - pupil enrollment count date
- The most recent current year Application, Combo form, or FEDS form

*Effective July 1, 2025*

- **Prior year documentation in the absence of current year documentation evidencing any at-risk eligibility**
  - Note: Prior year documentation must come from July 1 - June 30 of the year immediately before the current year. For CEP sites, however, the **best** documentation may come from any time during the current CEP cycle.

Tip: Compare your organization's current year's COGNOS reports to the prior year's COGNOS reports. Is there a significant change in the number of students reported free or reduced? Are there any students without an at-risk eligibility status? *Recommended reports are "District Summary of Pupil Counts", "Snapshot Records Excluded Due to Profile Errors", "Students Excluded from Student October Snapshot", and "Student Demographics Error Summary Report."*

Tip: Check the eligibility status of students transferring into your district/BOCES to determine if contacting the prior district/BOCES for documentation is necessary.