



COLORADO
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: **08/23/22**

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 district-reported 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:**

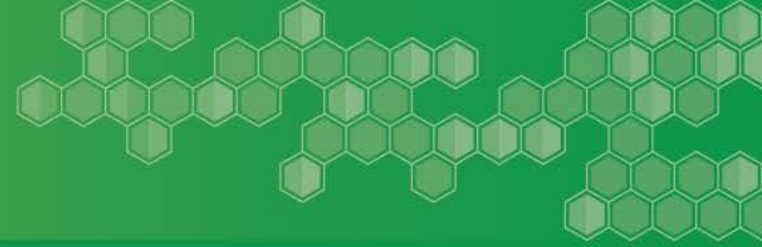
- Conducts compliance audits verifying that the data reported by districts in those data collections was accurate
- Provides technical guidance and support to districts throughout the year



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 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 2022

The 2022 pupil enrollment count date will be:

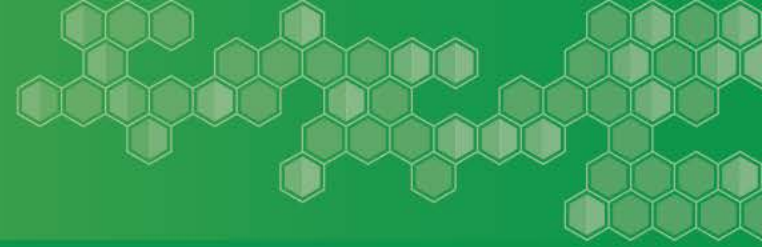
Monday, October 3, 2022

September						
Su	Mo	Tu	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	

October						
Su	Mo	Tu	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						
Su	Mo	Tu	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 alternative preschool count date will be **Tuesday, November 1, 2022** (for districts electing to use it)



- 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 or 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, reduced-price, 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

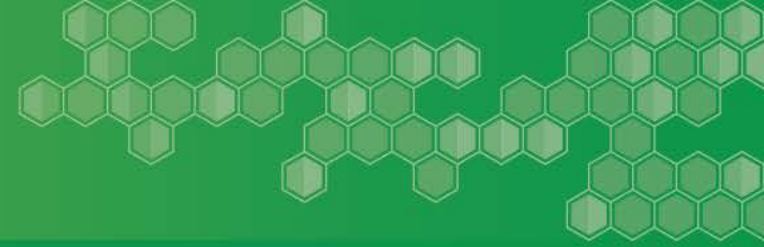
Categorical Eligibility

- Student determined to be free lunch eligible based on the individual student's foster, migrant, homeless, or runaway status

2022-2023 Income Eligibility Guidelines

Household Size	Free Guidelines					Reduced-Price Guidelines				
	Yearly	Monthly	2x/Month	Every Other Week	Weekly	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	\$17,667	\$1,473	\$737	\$680	\$340	\$25,142	\$2,096	\$1,048	\$967	\$484
2	\$23,803	\$1,984	\$992	\$916	\$458	\$33,874	\$2,823	\$1,412	\$1,303	\$652
3	\$29,939	\$2,495	\$1,248	\$1,152	\$576	\$42,606	\$3,551	\$1,776	\$1,639	\$820
4	\$36,075	\$3,007	\$1,504	\$1,388	\$694	\$51,338	\$4,279	\$2,140	\$1,975	\$988
5	\$42,211	\$3,518	\$1,759	\$1,624	\$812	\$60,070	\$5,006	\$2,503	\$2,311	\$1,156
6	\$48,347	\$4,029	\$2,015	\$1,860	\$930	\$68,802	\$5,734	\$2,867	\$2,647	\$1,324
7	\$54,483	\$4,541	\$2,271	\$2,096	\$1,048	\$77,534	\$6,462	\$3,231	\$2,983	\$1,492
8	\$60,619	\$5,052	\$2,526	\$2,332	\$1,166	\$86,266	\$7,189	\$3,595	\$3,318	\$1,659
For each additional family member add	\$6,136	\$512	\$256	\$236	\$118	\$8,732	\$728	\$364	\$336	\$168
Error-Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$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 prior-year 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**



Seamless Summer Option Carryover

- Districts will not have the option to operate under the Seamless Summer Option (in which all students eat for free) during the 2022-2023 school year.
- For the 2022-2023 school year ([per a USDA waiver](#)), districts may use the most recent eligibility determination from 2020-2021 or 2019-2020 during the 30-day carryover period, only IF:
 - The district operated under the Seamless Summer Option during the 2021-2022 school year AND
 - The district does not have a current year eligibility determination for the student



At-Risk Audit Documentation

School Auditing Office At-Risk Count Resources


Website:

https://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandduced

At-Risk Count

SCHOOL AUDITING OFFICE

At-Risk Count



2022 Count Date: Monday, October 3

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.



Upcoming At-Risk Count Webinars

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 you send PII via a secure method. For example, an encrypted email, a secure file sharing tool like Syncplify, or including the PII in a password protected document. If you have questions, contact CDE's Data Privacy Office at dataprivacy@cde.state.co.us.

Resource Guides

[2022-2023 At-Risk Count Audit Resource Guide \(updated 07/01/2022\) \(PDF\)](#)

Prior Audit Resource Guides


Prior versions of the Audit Resource Guide can be found by clicking [here](#).

Supplemental Resources

- At-Risk Data Validation Best Practices (PDF)
- Family Economic Data Survey for 2022-2023 - English (.docx)
- Family Economic Data Survey for 2022-2023 - Spanish (.docx)
- Family Economic Data Survey Instructions 2022-2023 - English (.docx)
- Family Economic Data Survey Instructions 2022-2023 - Spanish (.docx)
- Family Economic Data Survey Family Friendly 2022-2023 Instructions - English (.docx)

Resource Guide:

https://www.cde.state.co.us/cdefinance/2022_at-risk_audit_resource_guide



COLORADO Department of Education

2022 At-Risk Count Audit Resource Guide

Fiscal Year 2022-2023

Submitted to:
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 Finance and Operations Division

Katy Anthes, Ph.D. Commissioner of Education
Jennifer Oles Chief Operating Officer
Kate Bartlett, MBA Executive Director of School District Operations

School Auditing Office
Rebecca McRee Supervisor
Jessica Oxton Auditor
Tabitha Tyree Auditor
Adam Van Alstyne Auditor

Effective July 1, 2022

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

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



At-Risk Audit Documentation

Evidence of Free or Reduced-Price Lunch Eligibility

- Applications for Free and Reduced-Price School Meals
- Family Economic Data Survey (FEDS) forms

Evidence of Free Lunch Eligibility Only

- Categorical Eligibility Determinations (migrant, homeless, runaway and/or foster child lists)
- SNAP/TANF/Migrant Direct Certification Lists
- Extended Eligibility 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 **FEDS** forms, review the additional “Online Signature Guidance”:
 - http://www.cde.state.co.us/cdefinance/school_auditing_online_signatures

Audit Documentation

- [At-Risk Count Audit Questionnaire \(DOC\)](#)
- [At-Risk Count Documentation Quick Reference \(DOC\)](#)
- [Online Signature Guidance \(PDF\)](#)



Application- Template

<http://www.cde.state.co.us/nutrition/schoolmealeligibility#free>

[Insert District Name] 20__-20__ Household Application for Free and Reduced-Price School Meals

Apply online at **[Insert Webpage]**

Complete one application per household. Please use a black or blue pen (not a pencil).

STEP 1 List ALL Students' attending [Insert District Name] (if more spaces are required for additional names, attach another sheet of paper)

Student's First Name	MI	Student's Last Name	Birth Date					Grade	Foster Child	Head Start	Runaway	Homeless	Migrant
			M	M	D	D	Y						

Check all that apply. Read How to Apply for Free and Reduced-Price School Meals for more information.

STEP 2 If any household members (including you) currently receive assistance from any of the following programs: SNAP, TANF or FDPIR list the case number below.

Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF/Colorado Works – Basic Cash Assistance or State Diversion), or Food Distribution Program on Indian Reservations (FDPIR). Provide case number and skip to Step 4.

SNAP Case Number	TANF Case Number	FDPIR Case Number

STEP 3 Report income for ALL household members (skip this step if you provided a case number in STEP 2)

A. Student Income

Please include the TOTAL income, if any, received by all students listed above.

Student Income	How Often?				
\$	Weekly	Bi-Weekly	2x Month	Monthly	Annually
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

B. All Other Household Members (including yourself)

In the spaces below list all other household members not listed in Step 1 (including yourself) even if they do not receive income. For each household member listed, if they do receive income, report TOTAL GROSS INCOME (BEFORE TAXES AND OTHER DEDUCTIONS) for each source in whole dollars only. If they do not receive income from any source, write '0'. If you enter '0' or leave any field blank, you are certifying that there is no income to report.

Names of All Other Household Members (First and Last)	Earnings from Work	How Often?					Public Assistance/ Child Support/Alimony	How Often?					Pensions/Retirement/ All Other Income	How Often?				
		Weekly	Bi-Weekly	2x Month	Monthly	Annually		Weekly	Bi-Weekly	2x Month	Monthly	Annually		Weekly	Bi-Weekly	2x Month	Monthly	Annually
	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Total Household Members **Last four digits of Social Security Number (SSN) or mark "no SSN" of adult signing this form only if Step 3B has been completed.** XXX-XX- **Check box if no SSN**

STEP 4 Contact information and adult signature. Mail signed and completed application to: [Insert School/District Mailing Address]

"I certify (promise) that all information on this application is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws."

Mailing Address or PO Box		Apt # or Lot #	City	State	Zip Code	Email Address
Home or Cell Phone Number	SIGNATURE of Adult Household Member (Required)			Printed First and Last Name of Signer	Today's Date	

STEP 5 Release of Information

The information provided on this application will be used in conjunction with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (CHIP) offices. If your students are eligible to receive free or reduced-price meals this information may be shared with the school district for purposes of waiving school district program fees that your child(ren) might otherwise be required to pay. The school district is not permitted to share your information with anyone else. You are not required to consent to the release of your information; this will not affect your student(s) eligibility for school meals. Your information WILL be shared unless you check one of the boxes below.

Do NOT share my information with any programs
 Do NOT share my information with the programs I have checked:
 Medicaid/SCHIP
 Advanced Placement (AP) Exam and/or (AP) Book Fees
 Accelerate College Opportunity Exam and/or Book Fees
 List Specific Program
 List Specific Program

See back of application →



Family Economic Data Survey (FEDS) Form-Template

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

[Insert District Name] 20XX-20XX Family Economic Data Survey

Apply online at [Insert Webpage]

Complete one survey per household. Please use a pen (not a pencil).

STEP 1 List all student's attending [Insert District Name] (if more spaces are required for additional names, attach another sheet of paper)

Student's First Name	MI	Student's Last Name	No. Income	Birth Date					Grade	Foster Child	Head Start	Runaway	Homeless	Migrant
				M	M	D	D	Y						

Check all that apply:
 Read Federal Economic Data Survey Application Instructions for more information.

STEP 2 If household members (including you) currently participate in one of the following assistance programs: SNAP, TANF, or FDPIR list the case number below.

Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF/Colorado Works – Basic Cash Assistance or State Diversion), or Food Distribution Program on Indian Reservations (FDPIR). Provide case number and skip to Step 4.

SNAP Case Number

TANF Case Number

FDPIR Case Number

STEP 3 Report income for ALL household members (Skip this step if you provided a case number in STEP 2)

A. Student Income

Please include the TOTAL income, if any, received by all students listed above.

Student Income

How Often? Weekly Bi-Weekly 2x Month Monthly Annually

B. All Other Household Members (including yourself)

List all other household members not listed in Step 1 (including yourself) even if they do not receive income. For each household member listed, if they do receive income, report TOTAL GROSS (BEFORE TAXES AND OTHER DEDUCTIONS) for each source in whole dollars (no cents) only. If they do not receive income from any source, write '0'. If you enter '0' or leave any fields blank, you are certifying that there is no income to report.

Names of Other Household Members (First and Last)	Earnings from Work	How Often?					Public Assistance/Child Support/Alimony	How Often?					Pensions/Retirement/All Other Income	How Often?				
		Weekly	Bi-Weekly	2x Month	Monthly	Annually		Weekly	Bi-Weekly	2x Month	Monthly	Annually		Weekly	Bi-Weekly	2x Month	Monthly	Annually
	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Total Household Members (Students' and Adults)

STEP 4 Contact information and adult signature. Mail signed and completed application to: [Insert School/District Mailing Address]

"I certify (promise) that all information on this survey is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal, State, and/or Local Education Program funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose access to waivers of fees and the district/school may lose funding, and I may be prosecuted under applicable State and Federal laws."

Mailing Address or PO Box Apt # or Lot # City CO Zip Code Email Address

Phone SIGNATURE of Adult Household Member Printed First and Last Name of Signer Today's Date

STEP 5 Release of Information

The information provided on this survey will be used in conjunction with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (SCHIP) offices to seek enrollment of children into the above programs. Also, if your students qualify this information may be shared with the school district for the purpose of waiving certain school district program fees that your child(ren) might otherwise be required to pay. The school district is not permitted to share your information with anyone else. You are not required to consent to the release of your information; this will not affect your student(s)' eligibility for school meals. Your information WILL be shared unless you check one of the boxes below.

Do NOT share my information with any programs

Do not share my information with the programs I have checked:

Medicaid/SCHIP List Specific Program List Specific Program List Specific Program List Specific Program



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 non-participating sites, that Application can be used to determine lunch eligibility in Student October for all listed students
- Use FEDS forms when school sites:
 - Are NOT participating in the child nutrition program
 - ARE participating in Community Eligibility Provision (CEP)
 - ARE participating in Provision 2 (non-base years)
- Sites that do not participate in the NSLP 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.





Regional Migrant Liaisons

- The Office of Migrant Education at the Colorado Department of Education, is federally funded under [Title I, Part C](#) 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 Regional Migrant Liaison: <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 MKV Liaison: https://www.cde.state.co.us/studentssupport/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 CWEL: https://www.cde.state.co.us/studentssupport/fostercare_index

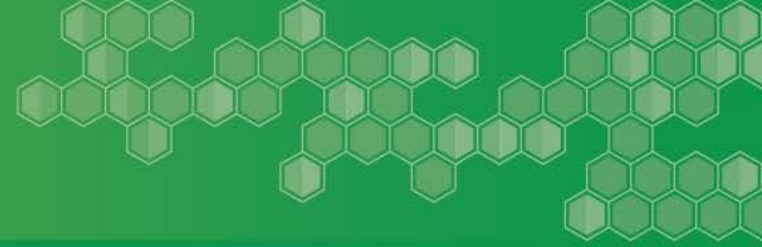
SNAP/TANF/FDPIR/Migrant Direct Certification




- 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
- 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



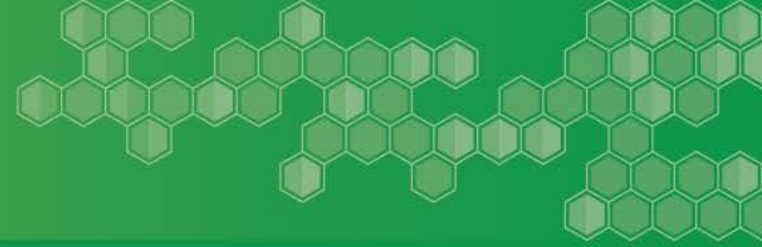
Extended Eligibility



- 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)
-  Categorical migrant, homeless, runaway, Head Start, and foster eligibility **cannot** be extended to other household members
- 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. Name/Initials of identifying staff member
 3. Original Directly Certified student's name
 4. DC list date (and/or a copy of the list)
 5. Basis of extension (add siblings form/same address/application/FEDS)



Extended Eligibility



Examples of how the required Extended Eligibility information may be documented:



- 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, and direct certification lists



Important to communicate to district staff and households:



Applying for free or reduced-price school meals is not considered a public charge



Applying for or receiving free or reduced-price school meals will not 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:

- <https://protectingimmigrantfamilies.org/know-your-rights/>
- <https://www.cde.state.co.us/nutrition/sharingfreeandreducedpriceinformationenglish>

Document Retention

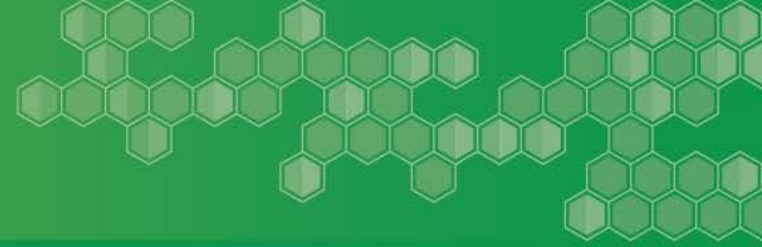


- Regardless of how a district or CSI determines student meal eligibility, the documentation must be retained and available until audited by the Department or until five years from the certification due date, whichever comes first
- Depending on the timing of the audit and the CEP/Provision 2 base year, CEP/Provision 2 schools & districts may need to retain at-risk eligibility documents for up to 9 years to include an entire 4-year cycle

Data Validation



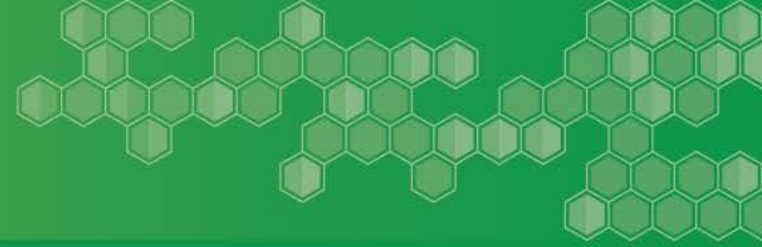
Annual Checks for District Staff



- Download & use the current year’s “At-Risk Audit Resource Guide”
 - <https://www.cde.state.co.us/cdefinance/auditunit atrisk freeandredused>
- Know the pupil enrollment count date and carryover drop-off date
- Assign at least two district staff to be knowledgeable about processing free and reduced-price applications
- Update all software for the current/new school year
 - Use the “Start of Year Checklist” for free and reduced-price lunch software systems



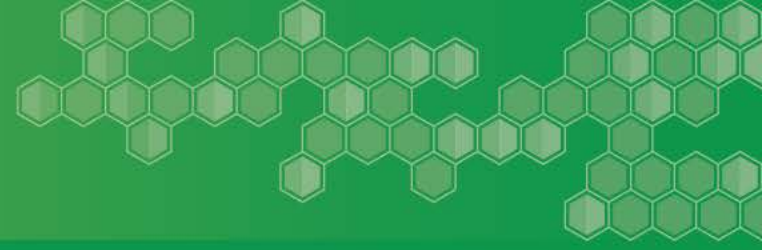
Data Validation



- 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
 - 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
- 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: Cognos Reports

- Cognos is a system accessed through the Data Pipeline 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: CEP and Provision 2 considerations

At the student 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



If updates are needed, a list will be uploaded to your district's Duplicate Count folder within your audit Syncplicity folder

- Keep this information for audit documentation purposes



The district should update FRL coding for these specific students when data is unlocked during duplicate count in November

Contact Information & Resources

School Auditing Office

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

Email: audit@cde.state.co.us

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



Questions?

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