



COLORADO
Department of Education

At-Risk Count Audit Overview: Free and Reduced-Price Lunch Eligibility Reporting in Student October

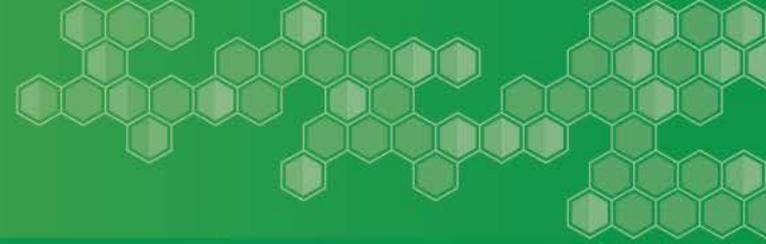
School Auditing Office

School Nutrition Unit

Date: **08/05/2021**

1. Define Student October Count data submission
2. Accurately report free and reduced-price lunch eligibility
3. Maintain correct documentation for audit purposes
4. Operate within the restrictions of the Seamless Summer Option extension for 2021/2022
5. Utilize data validation recommendations



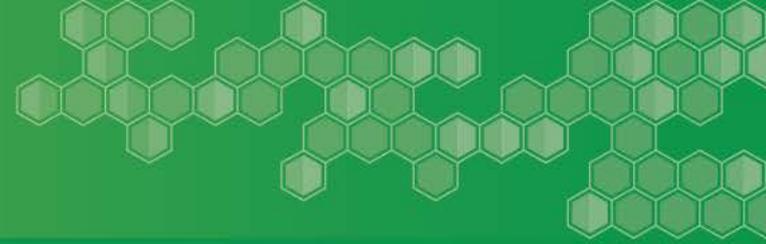


The School Finance Unit at CDE:

- 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:

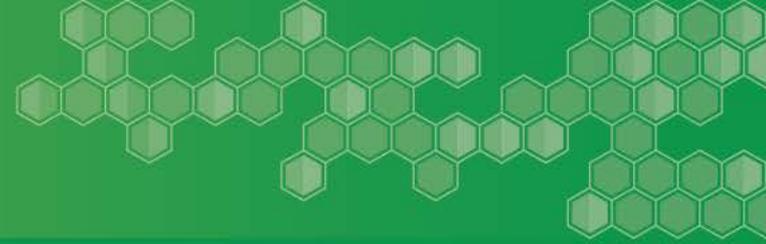
- Conducts compliance audits verifying that the data reported by districts in those data collections was accurate
- Provides technical guidance and support to districts throughout the year



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), and the Summer Food Service Program (SFSP)
- Conducts compliance audits verifying the SNPs are being implemented appropriately and provides technical assistance throughout the year
- Responsible for disseminating all free and reduced-price/school meal eligibility training and guidance (applications, FEDS Forms, and direct certification)

What are the Student October/Pupil & At-Risk Counts?



- 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.
 - Reported data is used to determine the district's per-pupil, English Language Learner, and **At-Risk** counts for the school year, which are then used to determine "Total Program" funding.

2021 Student October Count Date

The 2021 pupil enrollment count date will be:

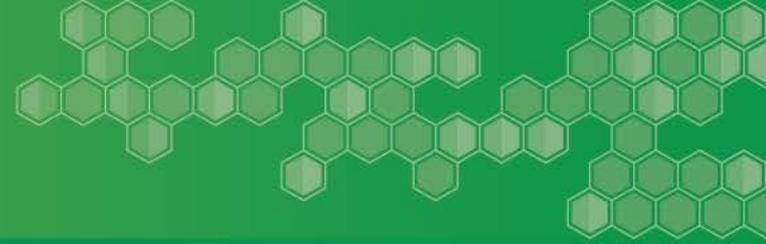
Friday, October 1, 2021

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						

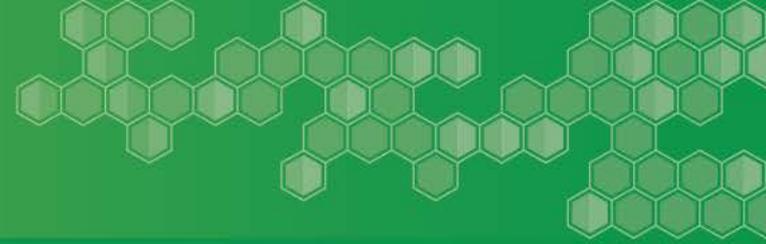
November						
Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

- The 11-day count period is the 5 days preceding the count date, the count date, and the 5 days following the count date (based on the LEA's adopted calendar).
- The alternative preschool count date is Monday, November 1.



- **NEW** Beginning with the 2021-22 school year, the At-Risk count will now include students reported as either free or reduced-price lunch eligible in the Student October Count.
 - Previously, only free lunch eligible students were included in the district's At-Risk count.
- No reporting requirements will change in the Student October Count data submission.
- Beginning with FY 2021-22, the At-Risk count audit samples will include funded students reported as free or reduced-priced lunch eligible.





- **NEW** Starting with the 2021-22 school year, free or reduced-price lunch eligibility status reported in the Student October Count data submission is the primary factor in the determination of district's At-Risk funding.
 - Funded students in grades K-12 only
- 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

~Applications and Direct Certification~

The Eligibility Process

Application (or FEDS)

- Student determined to be free, reduced-price, or paid lunch eligible based on household size and income or assistance program information

Direct Certification

- Student determined to be free lunch eligible based on participation in an approved assistance program

Categorical Eligibility

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

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"/>				

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"/>												

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.** --- **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	CO	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
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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						
	\$						\$						\$						\$					
	\$						\$						\$						\$					
	\$						\$						\$						\$					
	\$						\$						\$						\$					

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

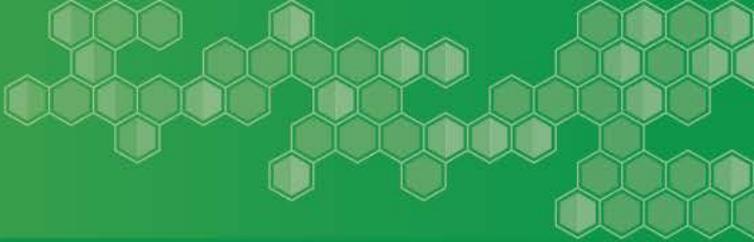
Do not share my information with the programs I have checked: Medicaid/SCHIP List Specific Program List Specific Program List Specific Program List Specific Program



2021-2022 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	\$16,744	\$1,396	\$698	\$644	\$322	\$23,828	\$1,986	\$993	\$917	\$459
2	\$22,646	\$1,888	\$944	\$871	\$436	\$32,227	\$2,686	\$1,343	\$1,240	\$620
3	\$28,548	\$2,379	\$1,190	\$1,098	\$549	\$40,626	\$3,386	\$1,693	\$1,563	\$782
4	\$34,450	\$2,871	\$1,436	\$1,325	\$663	\$49,025	\$4,086	\$2,043	\$1,886	\$943
5	\$40,352	\$3,363	\$1,682	\$1,552	\$776	\$57,424	\$4,786	\$2,393	\$2,209	\$1,105
6	\$46,254	\$3,855	\$1,928	\$1,779	\$890	\$65,823	\$5,486	\$2,743	\$2,532	\$1,266
7	\$52,156	\$4,347	\$2,174	\$2,006	\$1,003	\$74,222	\$6,186	\$3,093	\$2,855	\$1,428
8	\$58,058	\$4,839	\$2,420	\$2,233	\$1,117	\$82,621	\$6,886	\$3,443	\$3,178	\$1,589
For each additional family member add	\$5,902	\$492	\$246	\$227	\$114	\$8,399	\$700	\$350	\$324	\$162
Error-Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$1,200	\$100	\$50	\$44	\$24

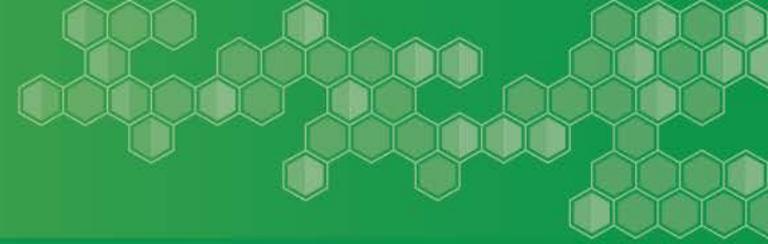




Carryover

- Carryover: 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.
 - First day of instructional time whether in-person or remote
- If the count date falls within a district's carryover period, the district may report the student's carryover status (if no current-year documentation has been provided).
- Documentation for current-year eligibility and/or prior-year eligibility must be maintained.

Variance Waiver



- If the 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**



At-Risk Audit Documentation

At-Risk Audit Documentation

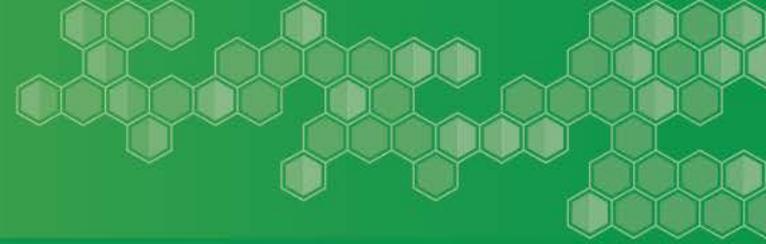
Evidence of Free or Reduced-Price Lunch Eligibility

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

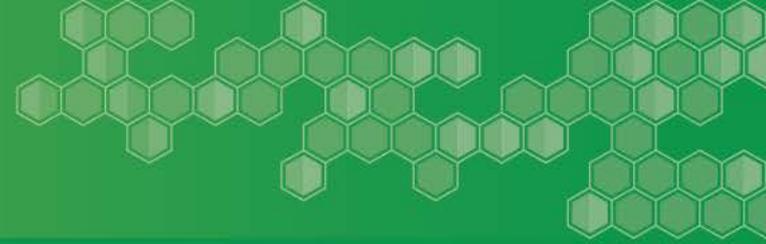
Evidence of Free Lunch Eligibility Only

- Categorical Eligibility Determinations (migrant, homeless, runaway and/or foster child lists)
- SNAP/TANF/MIGRANT Direct Certification Lists
- Extended Eligibility Documentation

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.
- FEDS forms are used 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)
- Districts must be able to provide the Application or FEDS form at the time of audit.
- Online Applications must show the date of submission, proof of signature, and have the ability to be shown at the time of audit.

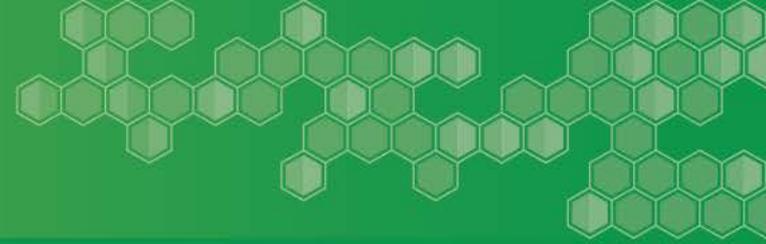


Question: If a family turns in an Application for Free and Reduced-Price Lunch that includes students who are attending both participating and non-participating sites, can the districts use the Application to report lunch status for all students listed on the application?

Answer: Yes, if a district or school distributes the Application to eligible students, then the district or school can use that Application for reporting lunch eligibility status in Student October for all listed students.

Note: *For the 2021-22 school year, applications cannot be distributed to students attending sites that are participating in SSO unless the district is participating in the CDE/CDHS P-EBT eligibility data collections. Provision 2 schools not in a base year and CEP schools operating SSO are to distribute FEDS forms.*

FEDS form considerations



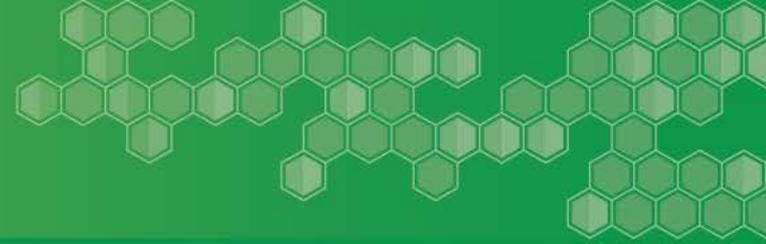
- For districts or schools wanting to implement an online collection of the FEDS form, please review the “Online Signature Guidance” posted to the School Auditing Office’s At-Risk Count webpage:
 - http://www.cde.state.co.us/cdefinance/school_auditing_online_signatures

Audit Documentation

- [At-Risk Count Audit Questionnaire \(DOC\)](#)
- [At-Risk Count Documentation Quick Reference \(DOC\)](#)
- [Online Signature Guidance \(NEW 06/03/21\) \(PDF\)](#)

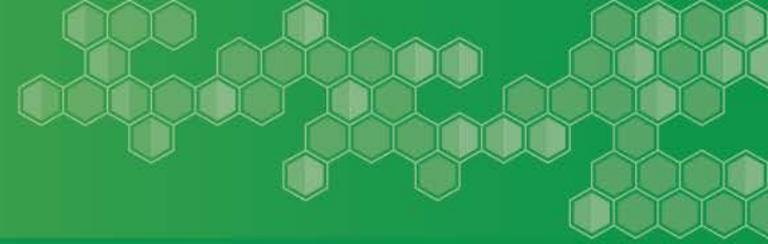


SNAP/TANF/Migrant Direct Certification List



- Any student who appears on a district SNAP/TANF/Migrant Direct Certification list from July 1 through the pupil enrollment count date must be reported as free lunch eligible.
- Best practice: Nutrition Services conducts Direct Certification uploads as much as possible from July 1 through the pupil enrollment count date.
- Update directly-certified student statuses accordingly.
- Consider conducting one upload on the pupil enrollment count date, to include students at non-participating sites.
 - District will need to reimburse the nutrition fund as appropriate for time spent on this process for non-participating sites.

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, but rather FEDS forms for At-Risk funding purposes (as needed).
- For audit purposes, all meal eligibility documentation (Applications, FEDS forms, and Direct Certification lists) must be maintained throughout the provisional program cycle.

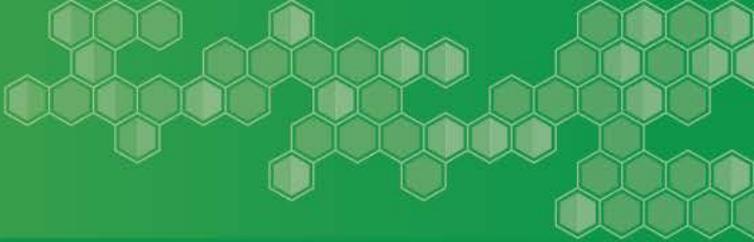
Categorical Eligibility Determinations

- Students determined to have one of the following designations must be reported as free lunch eligible in the October Count submission:
 - Foster Children
 - Migrant Students
 - Homeless or Runaway Students
 - Head Start
- Categorical eligibility for migrant, homeless, runaway, and head start must be confirmed via a district liaison list. Lists must contain student names and dates of identification.
- Complete foster Applications/FEDS form can be accepted at face value.
- See the School Meal Eligibility webpage for district liaison contacts:
<https://www.cde.state.co.us/nutrition/schoolmealeligibility>





Extended Eligibility



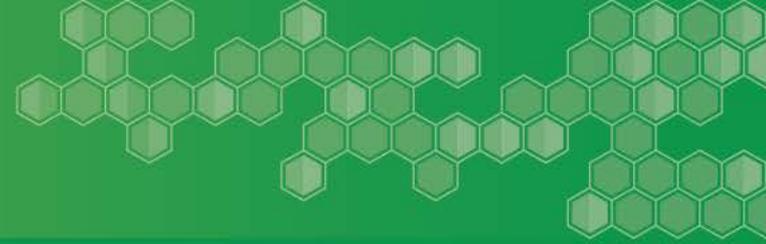
Extended Eligibility

- Free lunch eligibility is extended to all students in a household based on SNAP and/or TANF (via Application or Direct Certification).

 Migrant, homeless, runaway, Head Start, and foster eligibility cannot be extended.

- Documentation *must* include:
 1. Original Directly Certified student's name
 2. Basis of extension (add siblings form/same address/Application)
 3. Date of extension
 4. Initials of identifying staff member

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 SNAP or TANF 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

Immigrant/Migrant Families

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>

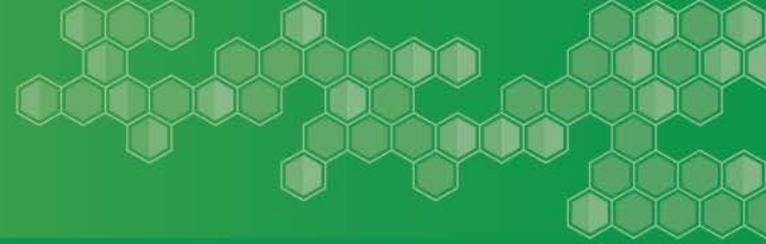


Non-Participating Sites

- Online schools, some charter schools, and other sites that do not participate in the NSLP must still maintain appropriate At-Risk eligibility documentation.
-  For these schools and sites, audit documentation evidencing free or reduced-price lunch eligibility **cannot** include Applications for Free and Reduced-Price School Meals.
- The FEDS forms and all other qualifying documents are used instead.

Seamless Summer Option for 2021/2022

What do we know?



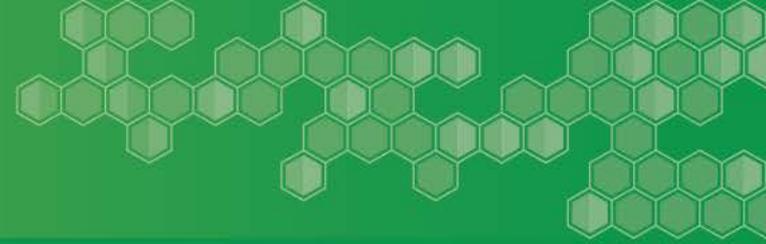
- Some schools may still be operating different teaching models across the state for the 2021-2022 school year:



- Remote learning: no in-person contact or students on site
 - In-person learning
 - Physically-distanced approach: small, in-person learning with remote learning rotations
 - Rolling starts and stops to in-person learning: move between in-person, or modified in-person and remote learning
- Districts must provide consistent and clear communication on how families can apply and why they should apply.

Option to Extend Summer Food Services Program

- On 04/20/2021, the USDA extended the option for school nutrition program sponsors to operate the Seamless Summer Option (SSO) through the entirety of the 2021-22 school year.
- If a sponsor decides to operate SSO in their district, this means that all students eat for free regardless of lunch eligibility status.
- Even though all students can eat for free, **districts must still have documentation to support free lunch eligibility if reported as such in the Student October Count Snapshot.**
 - Free and reduced-price applications
 - FEDS Forms
 - Direct certification match lists
 - Other source categorical documentation



- The U.S. Department of Agriculture provided updated guidance on the collection of Applications for Free and Reduced-Price School Meals for the 2021-22 school year.
 - Sponsors operating the Seamless Summer Option may collect and process free and reduced-price meal applications to establish eligibility for Pandemic-EBT only.
 - Sponsors operating the National School Lunch Program may continue to collect and process free and reduced-price meal applications as part of normal operations.
- Sponsors must provide new students, such as kindergarteners, and newly eligible children an opportunity to establish their eligibility, specifically for P-EBT. Paper copies of the free and reduced-price meal application must be made available at the district office. All disclosure requirements for release of student eligibility for non-P-EBT or non-program needs will apply.
- The 2021-22 free and reduced-price school meal application and supporting materials are now available and located on the School Meal Eligibility webpage.
- Additional details can be found at <http://www.cde.state.co.us/nutrition/backtoschoolfaq>

Considerations and Planning



Communication

- Modified letter to household
- Instructions on how to apply and where
- Marketing materials
- In-person protocols



Applications & FEDS forms

- Online
- Paper
- Kiosks
- Set up appointments

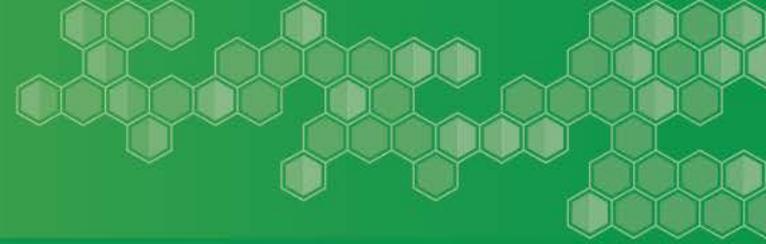


Assistance

- Fielding questions
- Application assistance
- Hold office hours
- Email and phone assistance hours

Data Validation

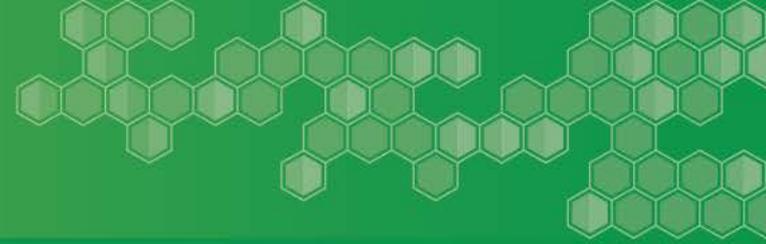
Data Validation



- Know the pupil enrollment count date
- 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).



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 should 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:

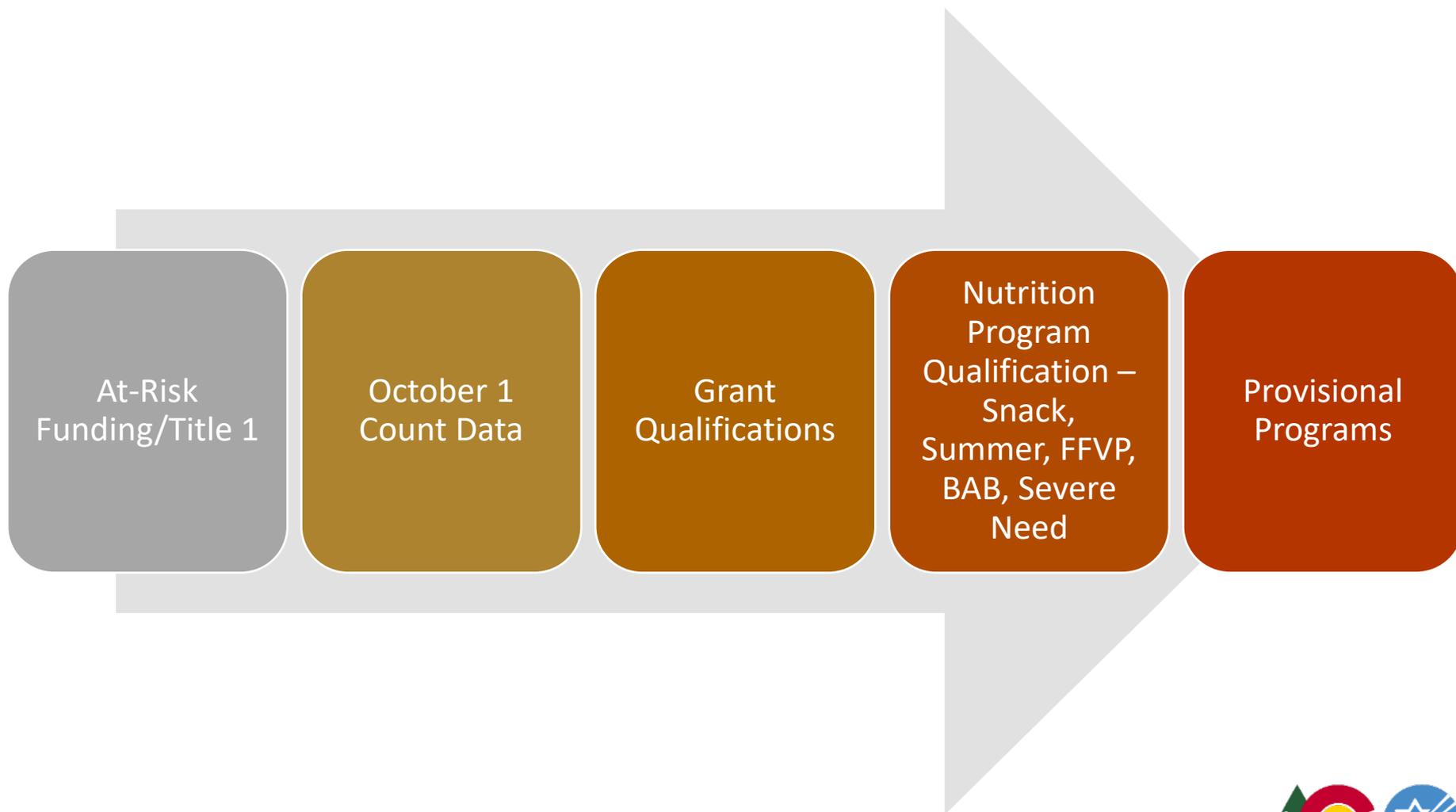
- CEP and Provision 2 students identified as free lunch eligible at any time from July 1 of the base year through the pupil enrollment count date of the current year must be reported as free lunch in the data submission.
- Students reported as free or reduced-price eligible in the base year retain this status throughout the provision cycle.
- Should a family appear 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

- Ensure all software is updated for the current/new school year.
 - Use the “Start of Year Checklist” for free and reduced-price lunch software systems.
- Ensure systems are importing/exporting data correctly and notification processes are in place when imports/exports fail.
- Attend available in-person trainings, online trainings, and webinars on this topic.
- Know the pupil enrollment count date and carryover drop-off date.
 - Use the “At-Risk Audit Resource Guide.”

Value of Meal Eligibility

More than a Meal



Maximize Eligibility

Strong communication plan
– Administrators,
October count coordinator, district liaisons

Implement edit checks to ensure data accuracy

Work with district to report eligibility for ALL school sites

Contact Information & Resources

School Auditing Office

Rebecca McRee mcree_r@cde.state.co.us

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

School Nutrition Unit

Rachael Burnham (free/reduced lunch eligibility determination) burnham_r@cde.state.co.us

Benjamin Wetherbee (provisional programs) wetherbee_b@cde.state.co.us

Website: <https://www.cde.state.co.us/nutrition>

Data Services Unit (Data Pipeline)

Brooke Wenzel wenzel_b@cde.state.co.us

Website: http://www.cde.state.co.us/DataPipeline/snap_studentOctober.asp

