COLORADO
Department of Education

At-Risk Count Audit Overview: Free and Reduced-Price Lunch Eligibility in 2024 Student October

August 8, 2024

Detailed Agenda

1. Student October Count data submission
2. At-Risk Funding for 2024/25
3. Nutrition Data vs. At-Risk Data
4. Audit Documentation
5. Required 2024 Preparation for 2025/26
    1. Free Lunch Eligibility **Identification** data field (Document Type Code)
    2. Census Block Data
6. Considerations for the Future
    1. CEP Record-Keeping
7. Data Validation Recommendations
8. Q&A

Introduction & Contacts

Who is the School Auditing Office?

The School Auditing Office:

- Publishes annual Audit Resource Guides, including the At-Risk Count Audit Resource Guide.
- Provides technical guidance and support to districts related to funding eligibility requirements and supporting audit documentation.
- Conducts annual audit reviews, and any subsequent expanded audits, of all funded counts used in determining a district's Total Program funding.
- Contact Information:
  - At-Risk Count website
  - Email: audit@cde.state.co.us
  - Audit Manager: Rebecca McRee (mcree_r@cde.state.co.us)

Who is the School Nutrition Unit?

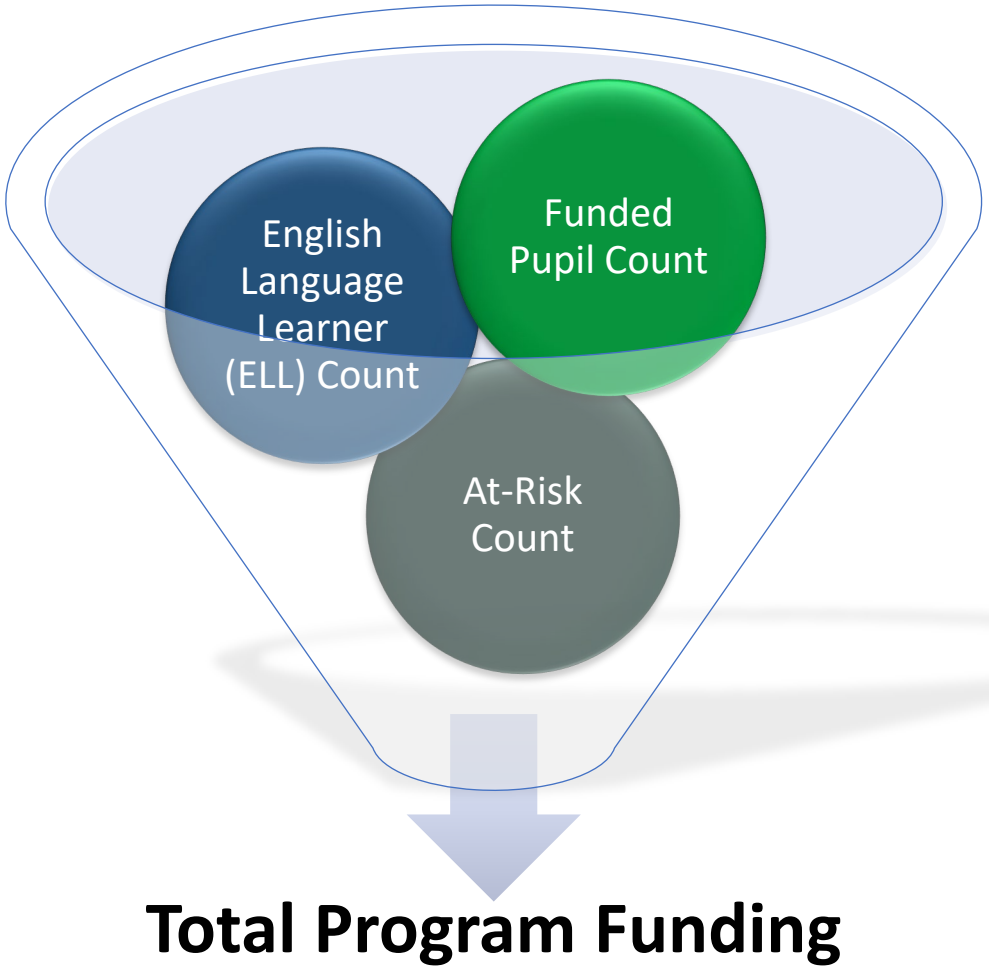
The School Nutrition Unit at CDE:

- Provides guidance and resources to districts operating school nutrition programs (SNPs):
  - National School Lunch Program (NSLP)
  - Healthy School Meals for All (HSMA)
  - Community Eligibility Program (CEP)/Provision 2
  - School Breakfast Program (SBP)
  - Summer Food Service Program (SFSP)
  - Etc.
- 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
- Contact Information:
  - Determine Program Eligibility website
  - Meal eligibility point of contact: Nell Dochez (dochez_n@cde.state.co.us)

What is the Student October Count Data Submission?

Counts From Student October Data Collection Determine Total Program Funding

- School districts in Colorado are funded by a variety of sources
- The biggest source of funding comes from the School Finance Act
- The amount a district receives according to the School Finance Act is called **Total Program**
- Counts from the Student October Count Data Collection are used to calculate Total Program Funding



Student October Count Data Submission

- It is very important for districts and schools to establish processes for reporting all Student October Count data fields accurately.
- Under- or over-reporting of the counts may result in:
  - Significant audit findings for the district
    - (i.e., the district owing money back to CDE or not receiving all eligible funds prior to audit)
  - Impacts to funding for districts across the state of Colorado
  - Impacts continuing from the current year to future years

Student October Count Day 2024

The 2024 pupil enrollment count date will be:

Tuesday, October 1, 2024

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

At-Risk Count Data in the 2024 October Count Data Submission

At-Risk Count October 2024

The At-Risk count funding criteria for 2024/2025 will be the same as they have been since 2021/2022.

- The At-Risk Count for 2024 includes students reported in Student October who meet all of the following criteria:
  1. Eligible for per pupil funding
  2. Grades K-12
  3. Free *or* reduced-price lunch eligible
- Valid lunch eligibility codes for the data submission:
  - 00 = Not eligible/ Paid
  - **01 = Free lunch eligible**
  - **02 = Reduced-priced lunch eligible**

At-Risk Count October 2024

The legislature has directed districts to report additional data starting in 2023 and continuing in 2024, which will be discussed later in this training.

However, **At-Risk Count funding for 2024/2025 will only be based on qualifying students who are eligible for free or reduced-price lunch.**

Free and Reduced-Price Lunch Status

- At-Risk status is closely linked to National School Lunch Program (NSLP) free and reduced-price lunch criteria
- Income guidelines mirror NSLP guidelines published by the USDA
  - Schools and districts are NOT permitted to create their own income guidelines for Student October reporting!
- Documentation types and requirements are also based on guidelines from the USDA and CDE's Nutrition Unit
- There are a few documentation differences, including:
  - There may be differences in allowable dates/date ranges between documents used for Nutrition eligibility purposes vs. documents used for At-Risk eligibility purposes
  - Schools may need to collect At-Risk documentation for students who do not need individual Nutrition documentation

What If All Students are Eating for Free?

- Many schools & districts in the state are participating in Healthy School Meals for All (HSMA) and/or CEP/Provision 2. These programs allow districts and schools participating in the National School Lunch Program to provide free meals to all students.
- Some students at these schools who eat for free under these programs may **not** be **eligible** for free (or reduced-price) meals.
  - Only students with qualifying eligibility documentation on file may be reported as free or reduced-price lunch eligible in the Student October Count data submission.
  - Some Point of Sale/School Nutrition System records may not accurately reflect the individual student data needed for Student October reporting. Therefore, some schools and districts may need to track student-level At-Risk data separately.

At-Risk Eligibility Documentation

At-Risk Eligibility Documentation

All sites/schools and districts must still maintain appropriate At-Risk eligibility documentation for each student!

This includes:

- Districts that participate in Healthy School Meals for All
- Districts/sites that participate in CEP or Provision 2
- Schools/sites that do not participate in the National School Lunch Program

At-Risk Document Retention

- Eligibility 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.

Types of Eligibility Documentation

Direct Certification	• Student determined to be free or reduced-price lunch eligible based on assistance program information or migrant status identified in the Colorado Nutrition Portal.
Categorical Eligibility	• Student determined to be free lunch eligible based on the individual student's foster, migrant, homeless, or runaway status.
Application, FEDS Form, or Combo Form	• Student determined to be free, reduced-price, or paid lunch eligible based on household size and income, assistance program information, or foster status

Types of Eligibility Documentation

Evidence of Free Lunch Eligibility Only

- SNAP/TANF/Migrant/Medicaid-Free Direct Certification Lists
- Extended Eligibility Documentation for those DC lists (excluding migrant)
- Categorical Eligibility Determinations (migrant, homeless, runaway and/or foster child lists)

Evidence of Reduced-Price Lunch Eligibility Only

- Medicaid-reduced status on Direct Certification Lists
- Extended Eligibility Documentation for Medicaid-Reduced

Evidence of Free or Reduced-Price or Paid Lunch Eligibility

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

Documentation Quick Reference Guide

Direct Certification
SNAP/TANF/FDPIR/(Migrant)

- Any student who appears on a sponsor's Direct Certification list from July 1 through the pupil enrollment count date must be reported as free or reduced-price lunch eligible
  - Medicaid-REDUCED is the only DC status leading to reduced-price lunch eligibility
- 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 receiving SNAP/TANF/FDPIR through any state other than Colorado, the household must provide a letter or other documentation from that state's benefit agency

Direct Certification
SNAP/TANF/FDPIR/(Migrant)

- The School Nutrition Unit's Recorded Trainings page includes a "Direct Certification Implementation" webinar with step-by-step directions for using the State Nutrition Portal
- Note: Due to a technical issue, some eligible SNAP and TANF students were not included in the files that were sent to School Nutrition in July 2024. CDE's Nutrition Unit has worked with our partner agencies to get that corrected and the full list is now available (as of 8/2/24).
  - For questions or more information, contact Nell Dochez at **dochez_n@cde.state.co.us**

Extended DC Eligibility

- Free lunch eligibility is extended to all students in a household based on one member's eligibility for SNAP, TANF, and/or FDPIR
- 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 **cannot** be extended to other household members
  - Even if migrant status is identified via the State Nutrition Portal during the direct certification process, migrant status cannot be extended.

Extending Eligibility from Different DC Match Types

The DC export file downloaded from the State Nutrition Portal identifies several possible match 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 – **NO extension**
MEDICAID **REDUCED**	**Reduced** meals – can extend **reduced** eligibility
SNAP/MIGRANT	Free meals based on SNAP status – can extend eligibility
MEDICAID-FREE/MIGRANT	Free meals based on Medicaid status – 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 based on **Medicaid**

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:
  - Date of extension
  - Original Directly Certified student's name
  - DC list date (and/or a copy of the list)
  - Basis of extension (add siblings form/same address/application/FEDS)
- Examples of how the required Extended Eligibility information may be documented include, but are not limited to:
  - 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

Categorical Eligibility Determinations

Students identified in any of these categories should be reported as **free** lunch eligible in Student October:

- Foster
- Migrant
- Homeless or Runway (McKinney-Vento)
- Head Start

Designation on a completed Application/FEDS form/combo form can be accepted at face value	Designation must be confirmed via the corresponding liaison list*
• Foster Children	• Migrant Students • (McKinney-Vento) Homeless or Runaway • Head Start

* Liaison lists must include student names and show the liaison identified/confirmed each student's status on or before count day

Categorical Eligibility Liaisons

- 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
- 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
- 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

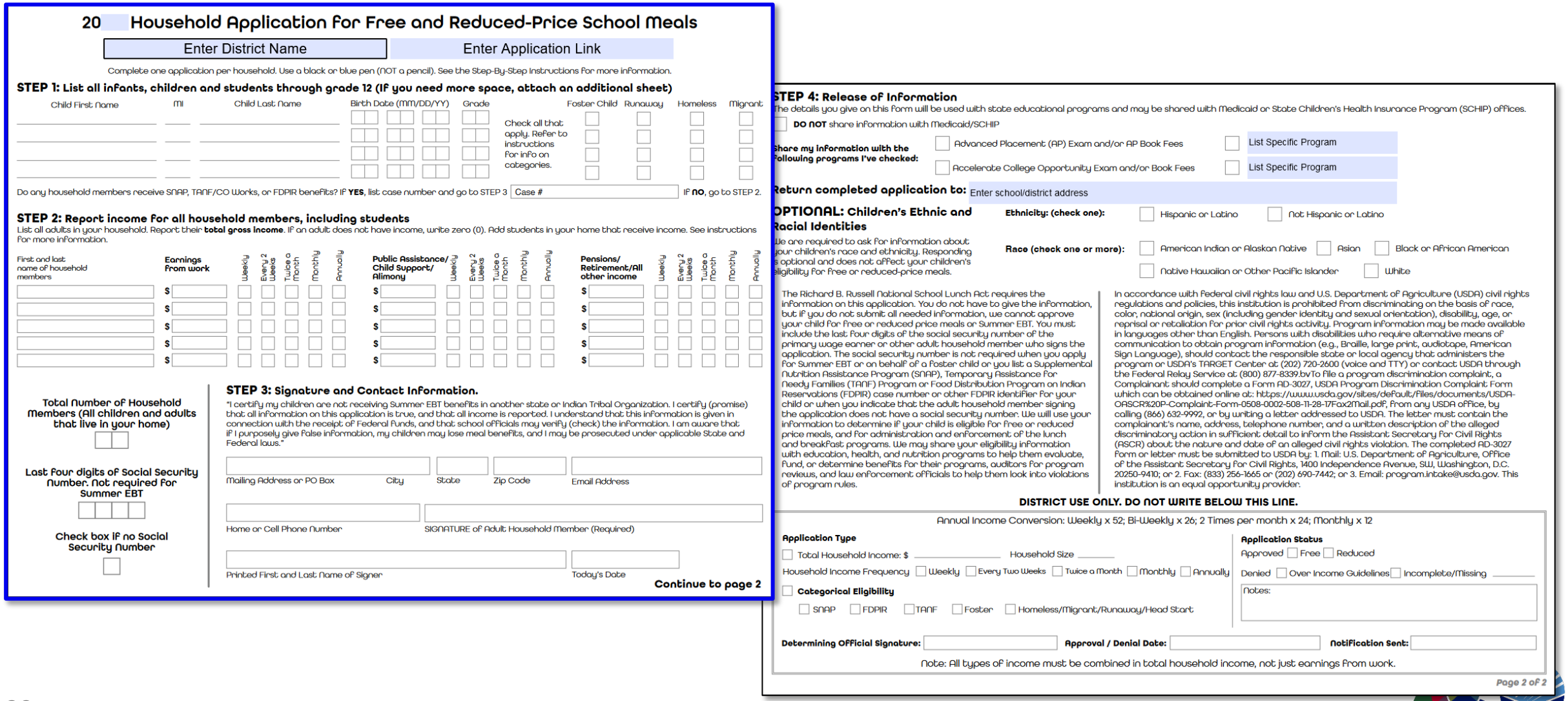
Applications, FEDS, and Combination Forms

- Three very similar forms may be used to collect household information
  - Household Application for Free and Reduced-Price School Meals (Application)
  - Family Economic Data Survey (FEDS)
  - Combination Form (Application for Free/Reduced-Price School Meals & Family Economic Data Survey)
- These forms are primarily used to evidence income-based eligibility (based on USDA income guidelines), but may also identify eligibility through assistance programs (SNAP/TANF) or foster status
- Paper form templates, instructions, and letters for all three forms are available on Nutrition's Determine Program Eligibility webpage
- Online Applications/FEDS forms
  - Electronic forms must collect ALL information shown on the paper templates
  - Must show the date of submission & proof of signature
  - For online FEDS forms, review the additional "Online Signature Guidance"

When To Distribute Applications, FEDS Forms, or Combo Forms

- Schools that do NOT participate in the National School Lunch Program (NSLP):
  - Must use the **FEDS form**
- Sites/schools participating in the NSLP:
  - Sponsors opting into HSMA with **no CEP** or **some CEP** schools will use the **Combo form**
  - Sponsors opting into HSMA with **all CEP** schools can use the **Combo form or FEDS form**
  - Sponsors **not opting into HSMA** will use the household income **Application**
- If a family turns in a form that includes students who attend both participating and non-participating sites, that form can be used to determine lunch eligibility in Student October for all listed students.
- Note: Costs for processing forms for students attending CEP schools or non-participating sites may not be paid from the nonprofit school food service account, or must be reimbursed from other district funds.
  - More information is available in the Nutrition Unit's HSMA FAQ, under Free and Reduced Lunch Application Requirements question #4.

Household Application for Free and Reduced-Price School Meals Template



20 Household Application for Free and Reduced-Price School Meals

Enter District Name | Enter Application Link

Complete one application per household. Use a black or blue pen (NOT a pencil). See the Step-By-Step Instructions for more information.

STEP 1: List all infants, children and students through grade 12 (IF you need more space, attach an additional sheet)

Child First Name	MI	Child Last Name	Birth Date (MM/DD/YY)	Grade	Foster Child	Runaway	Homeless	Migrant

Check all that apply. Refer to instructions for info on categories.

Do any household members receive SNAP, TANF/CO Works, or FDPIR benefits? IF **YES**, list case number and go to STEP 3 Case # IF **NO**, go to STEP 2.

STEP 2: Report income for all household members, including students

List all adults in your household. Report their **total gross income**. IF an adult does not have income, write zero (0). Add students in your home that receive income. See instructions for more information.

First and last name of household members	Earnings from work	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Public Assistance/ Child Support/ Alimony	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Pensions/ Retirement/All other income	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					

Total Number of Household Members (All children and adults that live in your home)

Last Four digits of Social Security Number. Not required for Summer EBT

Check box if no Social Security Number

STEP 3: Signature and Contact Information.

"I certify my children are not receiving Summer EBT benefits in another state or Indian Tribal Organization. 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 | 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

Continue to page 2

STEP 4: Release of Information

The details you give on this form will be used with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (SCHIP) offices.

☐ **DO NOT** share information with Medicaid/SCHIP

Share my information with the following programs I've checked:

☐ Advanced Placement (AP) Exam and/or AP Book Fees ☐ List Specific Program

☐ Accelerate College Opportunity Exam and/or Book Fees ☐ List Specific Program

Return completed application to: Enter school/district address

OPTIONAL: Children's Ethnic and Racial Identities

We are required to ask for information about your children's race and ethnicity. Responding is optional and does not affect your children's eligibility for free or reduced-price meals.

Ethnicity: (check one): ☐ Hispanic or Latino ☐ Not Hispanic or Latino

Race (check one or more): ☐ American Indian or Alaskan Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islander ☐ White

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not submit all needed information, we cannot approve your child for free or reduced price meals or Summer EBT. You must include the last four digits of the social security number of the primary wage earner or other adult household member who signs the application. The social security number is not required when you apply for Summer EBT or on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We may share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.bvTo file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by: 1. Mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; or 2. Fax: (833) 256-1665 or (202) 690-7442; or 3. Email: program.intake@usda.gov. This institution is an equal opportunity provider.

DISTRICT USE ONLY. DO NOT WRITE BELOW THIS LINE.

Annual Income Conversion: Weekly x 52; Bi-Weekly x 26; 2 Times per month x 24; Monthly x 12

Application Type

☐ Total Household Income: $ _____ Household Size _____

Household Income Frequency ☐ Weekly ☐ Every Two Weeks ☐ Twice a Month ☐ Monthly ☐ Annually

☐ **Categorical Eligibility**

☐ SNAP ☐ FDPIR ☐ TANF ☐ Foster ☐ Homeless/Migrant/Runaway/Head Start

Application Status

Approved ☐ Free ☐ Reduced

Denied ☐ Over Income Guidelines ☐ Incomplete/Missing _____

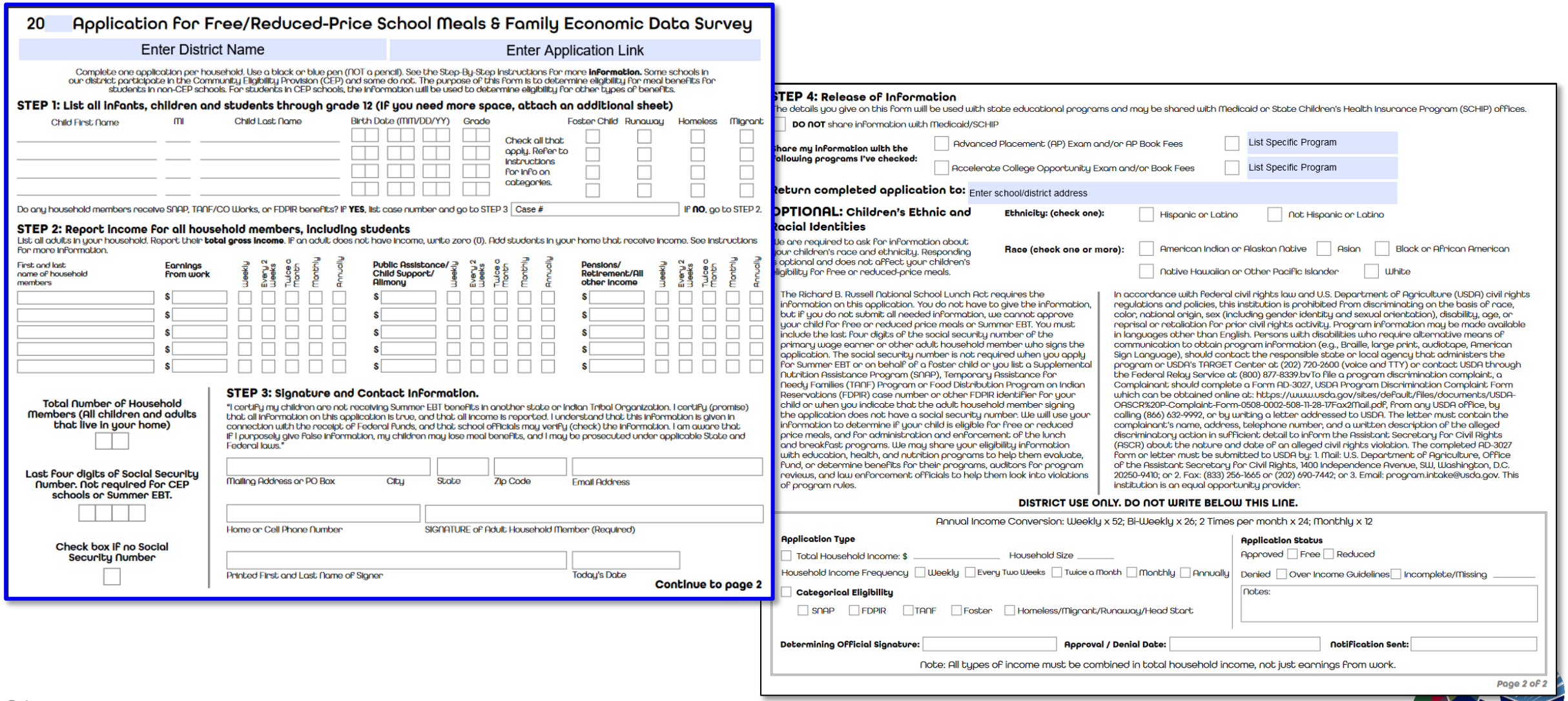
Notes:

Determining Official Signature: **Approval / Denial Date:** **Notification Sent:**

Note: All types of income must be combined in total household income, not just earnings from work.

Page 2 of 2

Combo Form Template



20 Application For Free/Reduced-Price School Meals & Family Economic Data Survey

Enter District Name | Enter Application Link

Complete one application per household. Use a black or blue pen (NOT a pencil). See the Step-By-Step Instructions for more **information.** Some schools in our district participate in the Community Eligibility Provision (CEP) and some do not. The purpose of this form is to determine eligibility for meal benefits for students in non-CEP schools. For students in CEP schools, the information will be used to determine eligibility for other types of benefits.

STEP 1: List all infants, children and students through grade 12 (IF you need more space, attach an additional sheet)

Child First Name	MI	Child Last Name	Birth Date (MM/DD/YY)	Grade	Foster Child	Runaway	Homeless	Migrant

Check all that apply. Refer to instructions for info on categories.

Do any household members receive SNAP, TANF/CO Works, or FDPIR benefits? IF **YES**, list case number and go to STEP 3 Case # IF **NO**, go to STEP 2.

STEP 2: Report income for all household members, including students

List all adults in your household. Report their **total gross income**. IF an adult does not have income, write zero (0). Add students in your home that receive income. See instructions for more information.

First and last name of household members	Earnings From work	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Public Assistance/ Child Support/ Alimony	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Pensions/ Retirement/All other income	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					

Total Number of Household Members (All children and adults that live in your home)

Last Four digits of Social Security Number. Not required for CEP schools or Summer EBT.

Check box if no Social Security Number

STEP 3: Signature and Contact Information.

"I certify my children are not receiving Summer EBT benefits in another state or Indian Tribal Organization. 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 | 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

Continue to page 2

STEP 4: Release of Information

The details you give on this form will be used with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (SCHIP) offices.

☐ **DO NOT** share information with Medicaid/SCHIP

Share my information with the following programs I've checked:

☐ Advanced Placement (AP) Exam and/or AP Book Fees ☐ List Specific Program

☐ Accelerate College Opportunity Exam and/or Book Fees ☐ List Specific Program

Return completed application to: Enter school/district address

OPTIONAL: Children's Ethnic and Racial Identities

We are required to ask for information about your children's race and ethnicity. Responding is optional and does not affect your children's eligibility for free or reduced-price meals.

Ethnicity: (check one): ☐ Hispanic or Latino ☐ Not Hispanic or Latino

Race (check one or more): ☐ American Indian or Alaskan Native ☐ Asian ☐ Black or African American ☐ Native Hawaiian or Other Pacific Islander ☐ White

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not submit all needed information, we cannot approve your child for free or reduced price meals or Summer EBT. You must include the last four digits of the social security number of the primary wage earner or other adult household member who signs the application. The social security number is not required when you apply for Summer EBT or on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We may share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.bvTo file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by: 1. Mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; or 2. Fax: (833) 256-1665 or (202) 690-7442; or 3. Email: program.intake@usda.gov. This institution is an equal opportunity provider.

DISTRICT USE ONLY. DO NOT WRITE BELOW THIS LINE.

Annual Income Conversion: Weekly x 52; Bi-Weekly x 26; 2 Times per month x 24; Monthly x 12

Application Type

☐ Total Household Income: $ _____ Household Size _____

Household Income Frequency ☐ Weekly ☐ Every Two Weeks ☐ Twice a Month ☐ Monthly ☐ Annually

☐ **Categorical Eligibility**

☐ SNAP ☐ FDPIR ☐ TANF ☐ Foster ☐ Homeless/Migrant/Runaway/Head Start

Application Status

Approved ☐ Free ☐ Reduced

Denied ☐ Over Income Guidelines ☐ Incomplete/Missing _____

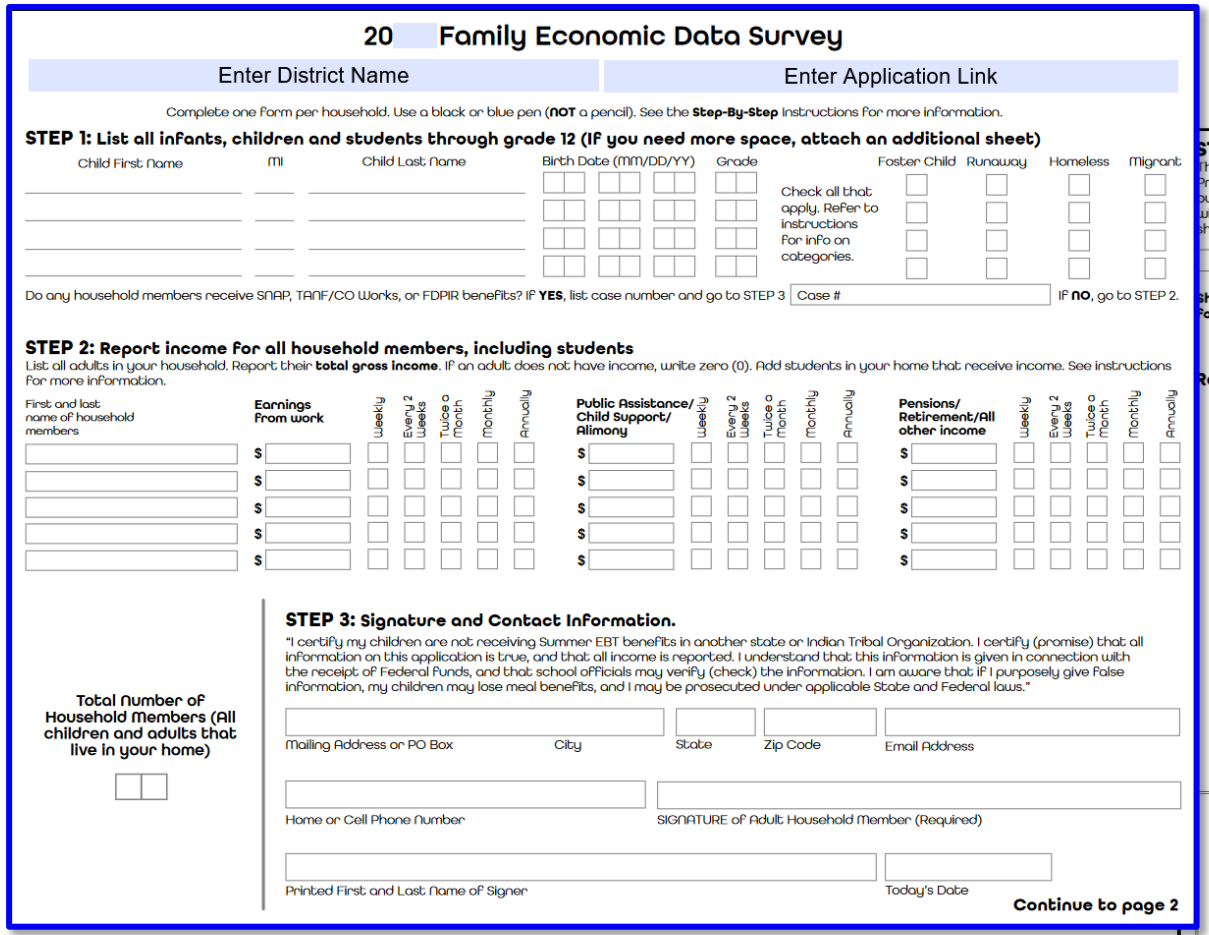
Notes:

Determining Official Signature: **Approval / Denial Date:** **Notification Sent:**

Note: All types of income must be combined in total household income, not just earnings from work.

Page 2 of 2

Family Economic Data Survey (FEDS) Form Template



20 Family Economic Data Survey

Enter District Name | Enter Application Link

Complete one form per household. Use a black or blue pen (**NOT** a pencil). See the **Step-By-Step** instructions for more information.

STEP 1: List all infants, children and students through grade 12 (IF you need more space, attach an additional sheet)

Child First Name	MI	Child Last Name	Birth Date (MM/DD/YY)	Grade	Foster Child	Runaway	Homeless	Migrant

Check all that apply. Refer to instructions for info on categories.

Do any household members receive SNAP, TANF/CO Works, or FDPIR benefits? IF **YES**, list case number and go to STEP 3 Case # IF **NO**, go to STEP 2.

STEP 2: Report income for all household members, including students

List all adults in your household. Report their **total gross income**. If an adult does not have income, write zero (0). Add students in your home that receive income. See instructions for more information.

First and last name of household members	Earnings from work	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Public Assistance/ Child Support/ Alimony	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually	Pensions/ Retirement/All other income	Weekly	Every 2 Weeks	Twice a Month	Monthly	Annually
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					
	$						$						$					

Total Number of Household Members (All children and adults that live in your home)

STEP 3: Signature and Contact Information.

"I certify my children are not receiving Summer EBT benefits in another state or Indian Tribal Organization. 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 | 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

Continue to page 2

STEP 4: 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 or district for the purpose of waiving certain school/district program fees that your children might otherwise be required to pay. The school or district is not permitted to share your information with anyone else. You are not required to consent to the release of your information, and 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 information with Medicaid/SCHIP

Share my information with the following programs I've checked:

☐ Advanced Placement (AP) Exam and/or AP Book Fees ☐ List Specific Program

☐ Accelerate College Opportunity Exam and/or Book Fees ☐ List Specific Program

Return completed application to: Enter school/district address

DISTRICT USE ONLY. DO NOT WRITE BELOW THIS LINE.

Annual Income Conversion: Weekly x 52; Bi-Weekly x 26; 2 Times per month x 24; Monthly x 12

Form Type

☐ Total Household Income: $ _____ Household Size _____

Household Income Frequency ☐ Weekly ☐ Every Two Weeks ☐ Twice a Month ☐ Monthly ☐ Annually

☐ **Categorical Eligibility**

☐ SNAP ☐ FDPIR ☐ TANF ☐ Foster ☐ Homeless/Migrant/Runaway/Head Start

Form Status

Approved ☐ Free ☐ Reduced

Denied ☐ Over Income Guidelines ☐ Incomplete/Missing _____

Notes:

Determining Official Signature: **Approval / Denial Date:** **Notification Sent:**

Note: All types of income must be combined in total household income, not just earnings from work.

Page 2 of 2

Free and Reduced-Price Income Guidelines 2024/2025

Free Lunch Income Guidelines

Household Size	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	$ 19,578	$ 1,632	$ 816	$ 753	$ 377
2	$ 26,572	$ 2,215	$ 1,108	$ 1,022	$ 511
3	$ 33,566	$ 2,798	$ 1,399	$ 1,291	$ 646
4	$ 40,560	$ 3,380	$ 1,690	$ 1,560	$ 780
5	$ 47,554	$ 3,963	$ 1,982	$ 1,829	$ 915
6	$ 54,548	$ 4,546	$ 2,273	$ 2,098	$ 1,049
7	$ 61,542	$ 5,129	$ 2,565	$ 2,367	$ 1,184
8	$ 68,536	$ 5,712	$ 2,856	$ 2,636	$ 1,318
For each additional family member add	$ 6,994	$ 583	$ 292	$ 269	$ 135
Error-Prone Threshold	$ 1,200	$ 100	$ 50	$ 44	$ 24

Reduced-Price Lunch Income Guidelines

Household Size	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	$ 27,861	$ 2,322	$ 1,161	$ 1,072	$ 536
2	$ 37,814	$ 3,152	$ 1,576	$ 1,455	$ 728
3	$ 47,767	$ 3,981	$ 1,991	$ 1,838	$ 919
4	$ 57,720	$ 4,810	$ 2,405	$ 2,220	$ 1,110
5	$ 67,673	$ 5,640	$ 2,820	$ 2,603	$ 1,302
6	$ 77,626	$ 6,469	$ 3,235	$ 2,986	$ 1,493
7	$ 87,579	$ 7,299	$ 3,650	$ 3,369	$ 1,685
8	$ 97,532	$ 8,128	$ 4,064	$ 3,752	$ 1,876
For each additional family member add	$ 9,953	$ 830	$ 415	$ 383	$ 192
Error-Prone Threshold	$ 1,200	$ 100	$ 50	$ 44	$ 24

All schools and districts **must** use these income guidelines for At-Risk eligibility determinations in the state of Colorado, regardless of National School Lunch Program participation.

Allowable Document Dates & Document Hierarchy

Allowable Document Dates for Provision 2 Sponsors

- A small handful of sponsors across the state are operating under **Provision 2** for 2024/2025.
- If your district is one of them, and 2024/2025 is not a base year for you, disregard the following date information and consult the 2024 At-Risk Count Audit Resource Guide for details.
- **All other** schools and districts (& CSI) will have uniform document date requirements for 2024 Student October At-Risk documentation, as discussed in the following slides.

Allowable Document Dates for CEP Sites in 2024/2025

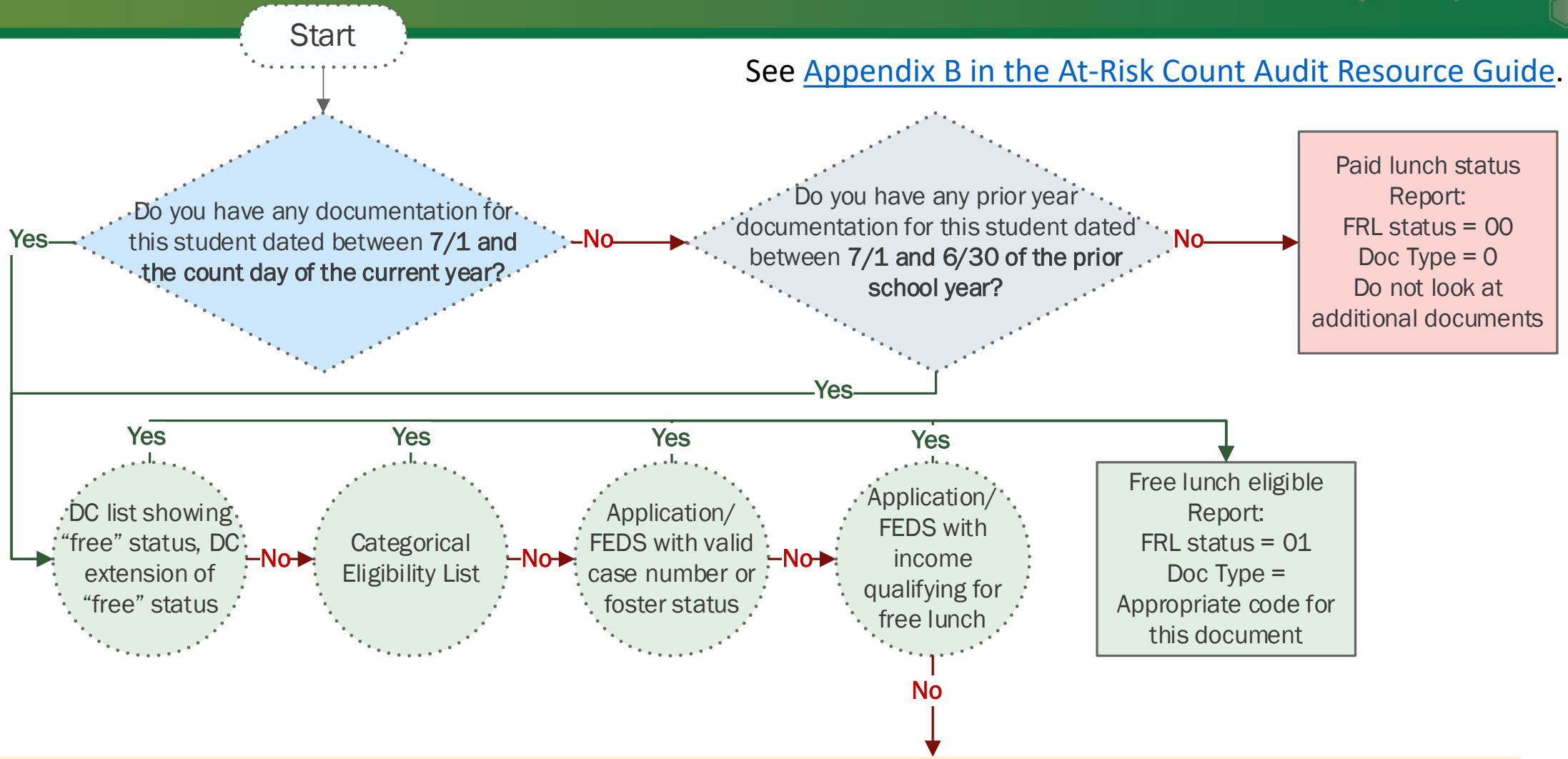
- CEP & Provision 2 schools and districts have a multi-year cycle, up to 5 years long, which may allow them to use the “best” document on record for a student from any time during the cycle.
- All CEP cycles across Colorado are resetting and will have a new base year of 2024/2025. Therefore, this year, all schools and districts across the state are either in a “normal year” or in a CEP “base year”.
- In the base year of a cycle, such as 2024/2025, allowable At-Risk document dates for students at CEP sites are the same as non-CEP schools.
- CEP sites have no special document flexibilities for 2024 Student October At-Risk reporting purposes.

Allowable Document Dates for 2024/2025 At-Risk Eligibility

- A “current year” document is dated between 7/1/24 and the pupil enrollment count date (10/1/24, unless your district/school has an alternative count date).
- If a student has **no** current year eligibility document on file, the district may use a “carryover” document, which must be dated between 7/1/23 and 6/30/24.
  - For 2024 Student October, if a current year document is on file for a student, that document must be used.
  - Schools or districts **MAY NOT** use a “better” carryover document for 2024/2025 if a current year document is on file for that student.
- No other documents may be used this year. For 2024 Student October, **every** Free/Reduced Lunch Price Eligible **code of 01 or 02** (i.e. every student coded as eligible for free or reduced-price meals) must be supported by a document in this date range!

What If a Student Has Multiple Documents On File? Normal/Base Year Flowchart

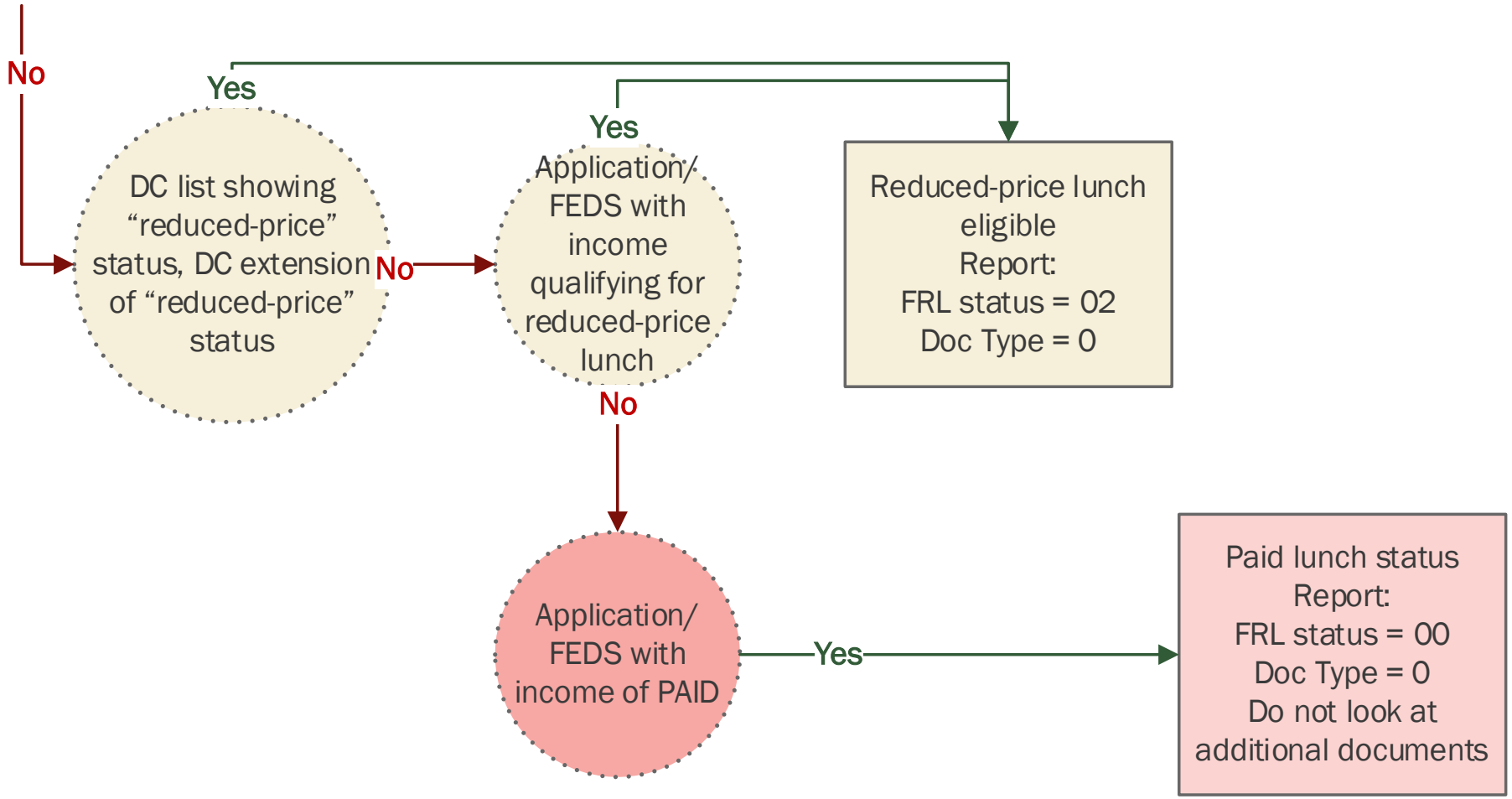
See Appendix B in the At-Risk Count Audit Resource Guide.



Continue to Check for Documents Supporting Reduced-Price & Paid Eligibility (next slide)

What If a Student Has Multiple Documents On File? Normal/Base Year Flowchart Cont'd

Continue from Check for Documents Supporting Free Lunch Eligibility (Previous Slide)



What If a Student Has Multiple Documents On File? Normal/Base Year Text Version

This is a text rendering of the flowchart above for students reported at **Non-NSLP (Non-Participating), Non-CEP, or CEP/Provision 2 Base Year** sites. See Appendix B in the At-Risk Count Audit Resource Guide.

1. Do you have any documentation for this student dated between 7/1 and the count day of the current year?
   a. If YES, go to **2**.
   b. If NO, go to **11**.
2. Do you have a DC list showing "free" status or a DC extension of "free" status?
   a. If YES, use Doc Type "1" and go to **6**.
   b. If NO, go to **3**.
3. Do you have a categorical eligibility list?
   a. If YES, use Doc Type "2" and go to **6**.
   b. If NO, go to **4**.
4. Do you have an Application/FEDS with valid case number or foster status?
   a. If YES, use Doc Type "3" and go to **6**.
   b. If NO, go to **5**.
5. Do you have an Application/FEDS with income qualifying for free lunch?
   a. If YES, use Doc Type "3" and go to **6**.
   b. If NO, go to **7**.
6. Student is Free lunch eligible.
   a. Use the appropriate Doc Type code for this document and report the **FRL status "01"**
   b. End.
7. Do you have a DC list showing "reduced-price" status or a DC extension of "reduced-price" status?
   a. If YES, use Doc Type "0" and go to **9**.
   b. If NO, go to **8**.
8. Do you have an Application/FEDS with income qualifying for reduced-price lunch?
   a. If YES, use Doc Type "0" and go to **9**.
   b. If NO, go to **10**.
9. Student is Reduced-Price lunch eligible.
   a. Use the Doc Type "0" and report the **FRL status "02"**
   b. End.
10. Student is Paid lunch status.
    a. Use the Doc Type "0" and report the **FRL status "00"**. Do not look at additional documents.
    b. End.
11. Do you have any documentation for this student dated between 7/1 and 6/30 of the prior year?
    a. If YES, go to **2**
    b. If NO, go to **10**

Data Required for 2024 Student October In Preparation for 2025/2026 Changes

Changes to At-Risk Funding Calculations Beginning in 2025/2026

- Per statute, the At-Risk funding calculation will change beginning in **2025/2026**.
- The new calculation will take two factors into consideration:
  1. Percentage of students certified as eligible for **free** lunch based on either:
     - Direct Certification (i.e. receipt of SNAP, TANF, FDPIR benefits or Medicaid-Free, as identified through the State Nutrition portal) **OR**
     - Categorical eligibility (foster, homeless, migrant, etc.)
  2. A neighborhood socioeconomic status index that is linked to each student's census block group.
- Beginning with 2025/2026, assume that the required At-Risk audit documentation will change.
- For more information regarding the new At-Risk Measure, visit the At-Risk Measure Working Group website.

2024 Preparations for New Requirements FY 2025/2026: Document Identification

In preparation for implementation of the new measure, districts are required to report additional data in 2024 Student October. This data will not affect At-Risk funding for 2024/2025.

- Free/Reduced Lunch Price Eligible data field
  - This is the historical data field indicating if the student is eligible for free, reduced-price, or paid school meals
- **Free** Lunch Eligibility **Identification** data field (AKA “Doc Type Code”)
  - This data field was introduced for the 2023/2024 year, and reports the type of document used to identify the student’s lunch eligibility status
  - Only **free** lunch students reported with a Doc Type Code of “1” or “2” will be included in the new calculation

For more information on the Lunch Eligibility and Free Lunch Eligibility Identification status fields, refer to the Student Demographic interchange file layout.

Free Lunch Eligibility Identification Field
AKA "Doc Type Code"

- The "**Free** Lunch Eligibility Identification" field (AKA "Doc Type Code") was added to the 2023 Student October Snapshot.
  - Any student reported with a Free/Reduced Lunch Price Eligibility value of **01** (**free lunch eligible**) must have a value of 1, 2, or 3 in the Doc Type Code field.
  - Reduced-price and paid lunch eligible students must have a value of 0 in the Doc Type Code field.
- Available document type 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 liaison lists, student-specific eligibility
3	Application (Application for Free and Reduced-Price Meals, Family Economic Data Survey Form, or Combination form)

See Appendix B in the At-Risk Count Audit Resource Guide for guidance choosing the correct doc type code.

2024 Preparations for New Requirements in FY 2025/2026: Census Block Data

Starting with the 2024-2025 school year, districts must also begin to report student census block data through the new At-Risk Interchange.

- This data will be used to assign socioeconomic status indexes, which will be part of the At-Risk funding calculation beginning in 2025/2026.
- Data Pipeline trainings and other information specific to the At-Risk Interchange File and the Geocode Tool are available on the Data Pipeline At-Risk Interchange website.
  - **Overview of the Geocode Tool** (Complete, recording & presentation available)
  - **Overview of the Geocode Tool** August 13, 2024 (10AM)
  - **Overview of the Data Pipeline At-Risk Interchange File** August 20, 2024 (1PM)
- **If this interchange data is not uploaded, you will not be able to submit your Student October Snapshot!**

Action item: If your district has not yet assigned the appropriate user roles for this interchange in IDM, your LAM must do so as soon as possible!

Considerations for the Future

Student Eligibility Tracking over the CEP Cycle

- In a base year, like 2024/2025, At-Risk documentation and eligibility requirements are the same at CEP and non-CEP sites.
- As the CEP cycle progresses, the district gains additional flexibilities that can be used to maximize At-Risk funding eligibility in Student October.
  - Using any document dated between 7/1 of the base year and count day of the current year
    - (Note: this excludes “carryover” documents from the year before the CEP cycle!)
  - Using whichever document provides the “best” eligibility status
- Using CEP documentation flexibilities for Student October data requires additional record-keeping.
  - Tracking all available documents on file for a student in the allowable date range
  - Determining which document offers the best status, and the corresponding eligibility code and Doc Type Code
  - Tracking whether each student has remained enrolled in only CEP schools within the district, as reported in Student October each year
- Forward planning now may save effort and maximize potential funding in later years.

Key Considerations in Distinguishing Nutrition Data vs. At-Risk Data

Historically, the four questions below aligned very closely. However, because different authorities with various priorities are responsible for these questions, the answers have diverged over time.

1. Who is eating for free?
2. Who is eligible for free or reduced-price lunch per USDA claiming rules?
3. Who is reported as free or reduced-price lunch eligible in Student October?
4. Who is included in the At-Risk Funding Count based on Student October Count data?

As the new At-Risk Measure is implemented, and CEP cycles move forward, consider how your district will divide responsibility for understanding & answering these questions.

See Appendix A in the At-Risk Count Audit Resource Guide for further discussion.

Data Validation

Annual Checks for District Staff

- Download & use the current year's At-Risk Audit Resource Guide
- Know the pupil enrollment count date
- Assign at least two district staff to be knowledgeable about processing applications/FEDS forms/combo forms
- Assign at least one district staff member to be knowledgeable about Census Block data – this is likely not a Nutrition staff member!
- Identify the officially designated liaisons who identify/confirm McKinney-Vento, Migrant, and Foster statuses for your district
- Update all software for the current/new school year
  - Use the "Local System Requirements Checklist" for free and reduced-price lunch software systems

Data Validation

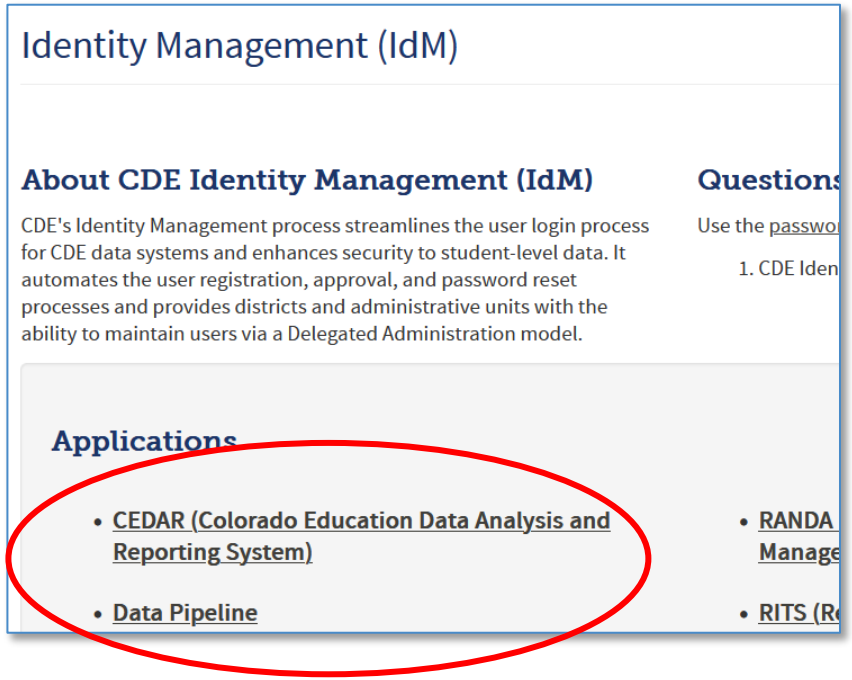
- Know which schools are:
  - Participating in the National Lunch Program (NSLP)
    - Participating in CEP or Provision 2
    - Participating in HSMA
  - NOT participating in the NSLP
    - (e.g., online schools, some charter schools, some AECs, etc.)
- Ensure Direct Certification is conducted as many times as possible from July 1 through the pupil enrollment count date (for all students)
  - Have a process to include students in non-NSLP schools
  - Plan to complete a list on count day if possible
- Ensure McKinney-Vento, Migrant, and Foster information is being gathered, validated, and entered into nutrition and SIS records
- 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 count date are reported as free lunch eligible, except Medicaid-Reduced
    - Medicaid-Reduced students must be reported as reduced-price lunch eligible
  - Students who are identified categorically eligible for free lunch (e.g., foster, migrant, homeless, runaway, etc.) from July 1 through the count date are reported as free lunch eligible

Data Validation: CEDAR/COGNOS Reports

- Cognos is a system accessed through IdM or 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 0 free lunch eligible students, or 0 reduced-price lunch students



Data Validation: CEDAR/COGNOS Reports, cont'd

- 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
  - **NEW:** Additionally Matched Direct Cert Students
- Descriptions of each of these reports can be found in the CEDAR/COGNOS Report Guide

New CEDAR/COGNOS Report: Additionally Matched Direct Cert Students

- Historically, the School Auditing Office manually checked each district's direct certification lists to monitor whether the students were reported as free (or reduced-price) lunch eligible
- If they were not reported correctly, the district data respondent received an email and a list of students to update
- Going forward, this information is now available to districts directly via the Additionally Matched Direct Cert Students report starting on or about October 10
- Districts & CSI will be expected to check this report and correct their data as needed
  - When updating any students based on this data, keep a copy of the report for audit documentation purposes

Student October Count Resources

- Funded Pupil Count
  - Pupil Count webpage
  - 2024 Student October Count Audit Resource Guide
- At-Risk Count
  - At-Risk Count Audit webpage
  - 2024 At-Risk Count Audit Resource Guide
  - Data Pipeline At-Risk Interchange website (census block data)
- English Language Learner (ELL) Count
  - English Language Learner Count webpage
  - 2024 English Language Learner Audit Resource Guide (NEW: Posted 8/6/24)

Contact

School Auditing Office Contact Information:

- At-Risk Count website
- Email: audit@cde.state.co.us
- Audit Manager: Rebecca McRee (mcree_r@cde.state.co.us)

At-Risk Interchange (Census Block Data) Contact Information

- At-Risk Interchange website
- Email: ARMeasure@cde.state.co.us

School Nutrition Unit Contact Information:

- Determine Program Eligibility website
- Meal eligibility point of contact: Nell Dochez (dochez_n@cde.state.co.us)

Questions?