



School Auditing Office
July 22, 2025



Welcome to At-Risk Office Hours: Tasks & Considerations

Agenda

- Introduction
 - School Auditing Office
 - Student October
 - 2025 At-Risk Audit Resource Guide
 - At-Risk Count
- Notes & Considerations
 - At-Risk Eligibility Status
 - At-Risk Documentation
 - Electronic Forms
 - Validating Reported At-Risk Data
- Tasks & Timeline
 - July - September
 - October
 - November, December
 - January - June
- Resources

Introduction

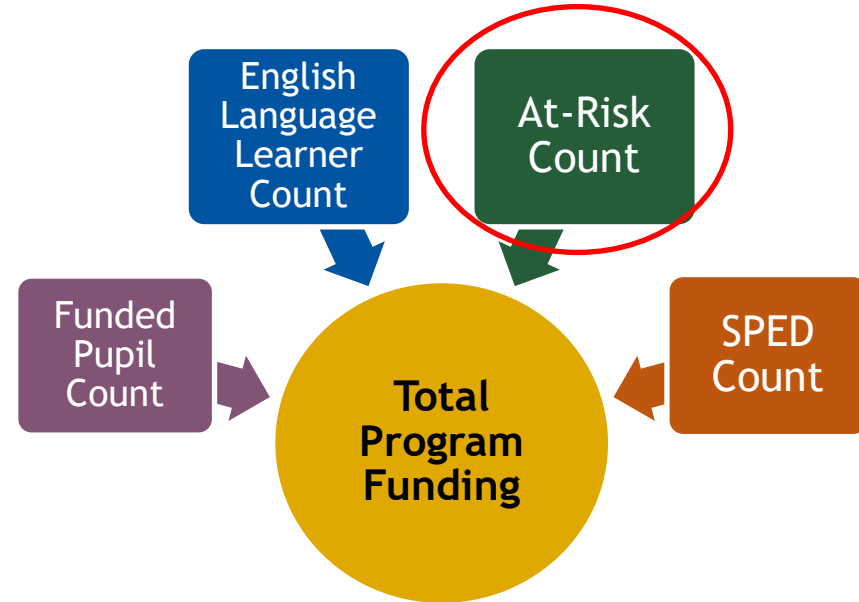


School Auditing Office

- Publishes annual Audit Resource Guides
- Provides technical guidance and support to districts related to funding eligibility and documentation requirements
- Conducts [Annual Audit Reviews](#) of all funded counts used in determining Total Program Funding
 - Includes reviewing submitted data, [audit questionnaires](#), prior audits, and student-level documentation
- Info & Contact
 - [School Auditing Office's Website](#)
 - Email: audit@cde.state.co.us


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 Funding**.
- Counts from the [Student October Count Data Collection](#) are used to calculate Total Program Funding.
- Note: The Special Education Pupil Count is new in 2025-2026 and will not be audited by the School Auditing Office this year.



2025 At-Risk Audit Resource Guide

- The School Auditing Office posts guides for each of those counts on the previous slide.
- Everything we review today will be in the 2025 At-Risk Audit Resource Guide.



COLORADO
Department of Education

2025 At-Risk Count Audit Resource Guide

Fiscal Year 2025
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)

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Effective July 1, 2025

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What is the criteria for inclusion in the At-Risk Count?

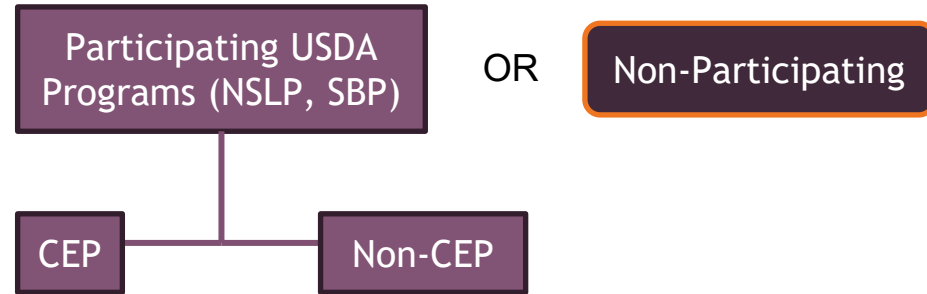
- For the 2025-2026 SY, any student who meets **all** of the following criteria as reported in the Student October Count data submission will be included in the district's At-Risk Count:
 - Grades K-12, **and**
 - Eligible for per pupil funding, **and**
 - Reported as free or reduced-price lunch eligible
 - Free/Reduced Lunch Price Eligible → Eligibility Status

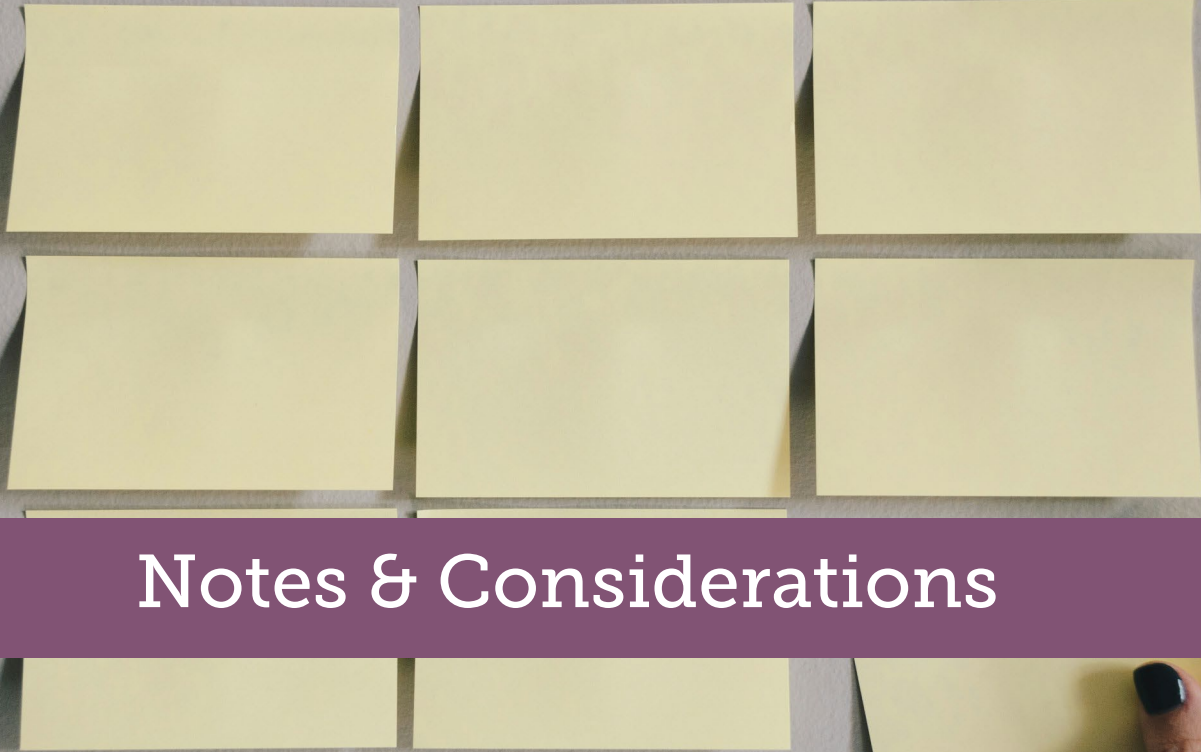
Additionally Collected At-Risk Data

- Districts submit the following at-risk data separate from the At-Risk Count:
 - Free Lunch Eligibility Identification
 - Method of documentation for students reported with an at-risk eligibility status of free
 - Census Block Data
 - Collected through the At-Risk Interchange

Clarification: NSLP Participation & CEP Participation

- Under USDA programs, including the National School Lunch Program (NSLP) and School Breakfast Program (SBP), **participating** schools/sites can operate as:
 - **CEP**, or
 - **Non-CEP**
- **Non-participating** programs are ones that do not have a School Food Authority and do not operate the NSLP or SBP





Notes & Considerations

At-Risk Eligibility Status

- *Every* student has a reporting at-risk eligibility status that is *separate* from their ability to eat for free or whether their school/site offers meals
 - Students who eat for free may have a different at-risk eligibility status
 - Students who attend a non-NSLP participating school/site have at-risk eligibility statuses
- Statuses are paid, reduced-price, or free lunch

At-Risk Eligibility Status, cont.

- Statuses come from the processing of:
 - Direct certification matches, including extended eligibility
 - Categorical liaison lists
 - Income Forms
 - Applications for Free or Reduced-Priced School Meals (Applications)
 - Family Economic Data Surveys (FEDS forms)
 - Combination forms (Combo forms)
- **Note:** Sites that operate under a School Food Authority (SFA) different than their district/BOCES should establish a process for statuses to be updated effectively between the SFA and the district/BOCES.

At-Risk Documentation

- To determine at-risk eligibility status, all schools/sites must use the following documentation regardless of whether they participate in USDA programs, including CEP, or not:
 - Complete direct certification match lists, including extended eligibility
 - Liaison lists for categorical eligibility (foster, migrant, homeless or runaway based eligibility)
 - Income Forms
 - It is the responsibility of organizations that participate in USDA programs to ensure that the appropriate form is provided to families.
 - The purpose of the Family Economic Data Survey (FEDS) is to provide an alternative way for districts to collect income information when neither the Application for Free and Reduced-Price School Meals nor the Combo form is appropriate to distribute.

Electronic Income Forms

- Electronic Applications/Combo forms must follow the USDA and Office of School Nutrition guidance found in the [Local System Checklist](#) on the [Determining Program Eligibility webpage](#)
- Electronic FEDS forms
 - Must follow the School Auditing Office's [Online Signature Guidance](#)
 - Must show date of submission and proof of signature
 - Must mirror the paper version, including the listing of all individual household members and individual income
 - Listing only a total number of household members will **not** be accepted
 - Income ranges will **not** be accepted

Validating Reported At-Risk Data

- All organizations should establish processes to validate reported at-risk data regardless of participation in a USDA program. Validation processes should include cross-referencing reported eligibility with the following current year documentation (July 1 - pupil enrollment count date (10/1)):
 - Complete direct certification lists
 - Liaison lists for categorical eligibility
 - The most recent current year Application, Combo form, or FEDS form
- **In the absence of current year documentation evidencing *any* at-risk eligibility, the district may use any of the above documentation from the prior year**
 - Note: Prior year documentation must come from July 1 - June 30 of the year immediately before the current year.



Allowable Document Dates for 2025/2026 At-Risk Eligibility (Students at All Schools/Sites not in CEP Years 2-4)

- Current year documentation dated on/between July 1 and the pupil enrollment count date (10/1)
- Carryover documentation from the year immediately prior to the current year if the student **does NOT have any current year documentation**
 - Districts/Schools **may NOT use a “better”** carryover document if a current year document exists
- Every student with an FRL code of 01 or 02 in Student October must be supported by a document in this date range
- Includes CEP base year schools/sites!

Allowable Document Dates for 2025/2026 At-Risk Eligibility (Students at CEP Sites/Schools **only** in Years 2-4)

- Current year documentation OR prior year documentation
- Districts *may* use the “best” available eligibility document dated between July 1 of the base year and the current year pupil enrollment count date (10/1)
 - Note: Starting in CEP Year 2, sites/schools cannot use a carryover document from the year prior to the base year
 - Example: A processing official at a school in a CEP base year used carryover documentation from the year prior to the base year for a student. The following year (CEP Year 2), the student would need a new document within the current CEP cycle.
- Every student with an FRL code of 01 or 02 must be supported by a document in this date range
- Note: A current Notice of Rulemaking is being considered by the State Board of Education that may remove this flexibility in 2026-2027



Validating Reported At-Risk Data: CEDAR/COGNOS Reports

- CEDAR/COGNOS reports are available through [Data Pipeline](#)
- Assist with comparing year-over-year data
- Red flags:
 - Schools/sites reporting zero free/reduced-price lunch students
 - A drastic change in the number of reported students at the school/site level
- Error reports help identify students whose data needs to be corrected before final submission
- *Tip:* Check the eligibility status of students transferring into your district/BOCES to determine if contacting the prior district/BOCES for documentation is necessary.



Validating Reported At-Risk Data: CEDAR/COGNOS Reports, cont.

Helpful reports:

- District Summary of Pupil Counts
- School Summary of Pupil Counts
- Additionally Matched Directly Certified Students
- Error Reports
 - Snapshot Records Excluded Due to Profile Errors
 - Students Excluded from Student October Snapshot
 - Student Demographics Error Summary Report

A top-down view of a wooden desk. In the center is a clipboard with a silver clip at the top, holding a white sheet of paper with a 'TO DO:' list. The list has five horizontal lines, each starting with a small yellow circle. A black pencil lies diagonally across the bottom right of the paper. To the left of the clipboard are a pair of black-rimmed glasses. In the top left corner, there are two small potted succulent plants. The background is a light-colored wooden surface.

TO DO:

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Timeline & Tasks

July - September

- Training & Resource Updates
 - Download and review the [2025 At-Risk Count Audit Resource Guide](#)
 - Attend [School Auditing Office](#) and [At-Risk Interchange](#) trainings
- Collect Eligibility Information
 - Distribute and process Applications, Combo forms, and/or FEDS forms
 - Run a direct certification monthly
 - Ensure nutrition software is up to date with current year information (i.e., income guidelines)
 - Office of School Nutrition's [Local System Requirements Checklist](#)
 - Calculate the USDA 30-day carryover expiration date
 - If the USDA 30-day carryover expiration date lapses prior to the pupil enrollment count date (10/1), use prior year documentation for students showing free/reduced-price at-risk eligibility if **students do not have any current year documentation**.
 - For CEP sites, districts may use the status from the best document as previously discussed

July – September, cont.

- Data & Reporting
 - Obtain Census block data after collecting and verifying physical addresses for all students
 - Note: Use the [Census Geocoder Tool](#) or your organization's GIS as needed
 - Begin populating the [At-Risk Interchange File](#)
- Submit the [At-Risk Count Questionnaire](#) by 9/15/2025
 - Overview of the [Annual Audit Review](#) process
 - [At-Risk Office Hours](#): 2025 Annual At-Risk Audit Questionnaire 8/12 at 1pm

October

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

November & December

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

January - June

- Training & Resource Updates
 - Attend [School Auditing Office](#) and [At-Risk Interchange](#) trainings
- Provide audit documentation to CDE related to any expanded audit resulting from the [Annual Audit Review](#)



Resources



Resources from CDE

School Auditing Office Website

- Upcoming & Recorded Trainings
 - Overview of the At-Risk Count Audit 8/05 at 1pm
 - At-Risk Office Hours: 2025 Annual At-Risk Audit Questionnaire 8/12 at 1pm
 - At-Risk Office Hours: Data Validation Techniques and Tools for Validation 10/15 at 1pm
 - At-Risk Office Hours: Questions from the Field (Live Q&A) 10/21 at 1pm
 - At-Risk Office Hours: Questions from the Field (Live Q&A) 11/04 at 1pm
- At-Risk Count webpage and Resource Guide
 - Tasks & Considerations Document
 - Online Signature Guidance
- Email: audit@cde.state.co.us; miner_c@cde.state.co.us

Resources from CDE, cont.

Office of School Nutrition Website

- [Determine Program Eligibility webpage](#)
- [Local System Requirements Checklist](#)

Data Pipeline

- [At-Risk Interchange webpage](#) (Census Block Data)
 - Upcoming Trainings
 - Overview of the At-Risk Geocoding Tool 7/31 at 1pm
 - Overview of the Data Pipeline At-Risk Interchange File 8/21 at 10am
 - Office Hours: Census Geocoder Tool Deep Dive (Live Demonstration) 8/27 at 1pm
 - Office Hours: Tools to Validate Addresses for Census Block Data Collection 9/09 at 1pm
 - Office Hours: Questions from the Field: Live Q & A 10/9 at 1pm
 - Email: ARMeasure@cde.state.co.us
- [CEDAR/COGNOS Reports](#)
- [Identity Management \(IdM\)](#)



Questions?