



COLORADO
Department of Education

Student October Count and At-Risk/Free Lunch Eligibility

~ Understand your data, report your data accurately and maximize district funding ~

Call-in Line: 855.397.4421

Webinar will start at 2:00PM

School Nutrition Unit – Rachael Burnham

School Auditing Office – Rebecca McRee

Virtual Housekeeping



- File share in the top right corner includes:
 - At-Risk/Free Lunch Audit Resource Guide
 - Best Practice Resource – At-Risk/Free Lunch
 - Start of Year Checklist for Software Systems
- Use the chat box located in the bottom right corner to ask questions, or ask over the phone line

Learning Objectives

1. Define Student October Count data submission
2. Accurately report free and reduced-price eligibility
3. Maintain correct documentation for audit purposes
4. Utilize data validation recommendations



What is October Count & At-Risk Funding?

Student October Count Data Submission

- Student October Count is a one-day membership count
 - The pupil enrollment count date for 2019 is **October 2**
- 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 both the district's per-pupil and **at-risk** funding for the school year



At-Risk Count and Funding

- Free lunch eligibility status reported in Student October Count data submission is the primary 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

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

Direct Certification

- Student determined free based on participation in an approved assistance program

[Insert District Name] 2019-2020 Family Economic Data Survey
 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 address, use the back of this page.)

Student's First Name _____

Apply online at **[Insert Website]**

Income Eligibility Guidelines

(Effective from July 1, 2019 to June 30, 2020)

FOR SCHOOL USE ONLY. DO NOT DISTRIBUTE TO PARENTS.

Household Size	Free Guidelines					Reduced Guidelines				
	Yearly	Monthly	2x/Month	Bi-weekly	Weekly	Yearly	Monthly	2x/Month	Bi-weekly	Weekly
1	\$16,237	\$1,354	\$677	\$625	\$313	\$23,107	\$1,926	\$963	\$889	\$445
2	\$21,983	\$1,832	\$916	\$846	\$423	\$31,284	\$2,607	\$1,304	\$1,204	\$602
3	\$27,729	\$2,311	\$1,156	\$1,067	\$534	\$39,461	\$3,289	\$1,645	\$1,518	\$759
4	\$33,475	\$2,790	\$1,395	\$1,288	\$644	\$47,638	\$3,970	\$1,985	\$1,833	\$917
5	\$39,221	\$3,269	\$1,635	\$1,509	\$755	\$55,815	\$4,652	\$2,326	\$2,147	\$1,074
6	\$44,967	\$3,748	\$1,874	\$1,730	\$865	\$63,992	\$5,333	\$2,667	\$2,462	\$1,231
7	\$50,713	\$4,227	\$2,114	\$1,951	\$976	\$72,169	\$6,015	\$3,008	\$2,776	\$1,388
8	\$56,459	\$4,705	\$2,353	\$2,172	\$1,086	\$80,346	\$6,696	\$3,348	\$3,091	\$1,546
For each additional family member add	\$5,746	\$479	\$240	\$221	\$111	\$8,177	\$682	\$341	\$315	\$158
Error Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$1,200	\$100	\$50	\$44	\$24

STEP 2 Do NOT share my information with any programs Medicaid/SCHIP Offices

The information provided on this survey is used to determine if your students are eligible to receive free or reduced-price school meals. Your information **WILL** be shared unless you check one of the boxes below.

Do NOT share my information with any programs Medicaid/SCHIP Offices

Medicaid/SCHIP

List Specific Program

List Specific Program

List Specific Program

List Specific Program





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 operating days of the new school year
- 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 requests an extension of the 30 day carryover provision for At-Risk October 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 reason for the waiver and be emailed to Jennifer Okes (okes_j@cde.state.co.us) by **September 15th**

At-Risk Audit Documentation



At-Risk Audit Documentation



- Evidence of free lunch eligibility includes:
 - SNAP/TANF/MIGRANT Direct Certification Lists
 - Applications for Free and Reduced-Price School Meals
 - Family Economic Data Survey (FEDS) forms
 - Categorical Eligibility Determinations (migrant, homeless, runaway and/or foster child lists)
 - Extended Eligibility Documentation

Audit Documentation Matrix

	At-Risk Funding Documentation ¹	Child Nutrition Programs Documentation ¹
Participating in Child Nutrition Programs (not through an alternative provision)	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
Participating in Community Eligibility Provision (CEP) Base Year	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
Participating in Provision 2 Base Year	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists	Application for Free and Reduced Price Meals Direct Certification District migrant, homeless, runaway or foster lists Head Start documented participation
CEP/Provision 2 Years 2, 3, 4 for NEWLY ENROLLED students after Base Year	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	None
Years 2, 3, 4 for students documented in Base or Subsequent Year	Evidence that the students documented in base year remain included in the district's pupil enrollment ²	None
Not Participating in Child Nutrition Programs	Family Economic Data Survey form ² Direct Certification ² District migrant, homeless, runaway or foster lists ²	Not Applicable

1. Pursuant to 1 CCR 301.39 2254-R-8.02, districts should retain all required documentation in a central location until audited by the Department or until five years from the certification due date (November 10) whichever comes first.

2. The district's food service fund cannot be used for any processing or maintenance of documentation not associated with eligibility for the child nutrition programs as it is an unallowable cost. Other district resources must be used. If the district wishes to have food service personnel process the surveys, the food service fund must be reimbursed for the cost of this processing.



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
- Ensure directly certified student statuses are updated accordingly

Applications and FEDS Forms

- Students determined free lunch eligible via an application or FEDS form, must be reported as free 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 the Provision 2 (non-base years)
- Must provide the application or FEDS form at the time of audit
- Online applications must show date of submission, proof of signature and have ability to be shown at time of audit



Provisional Programs



- CEP and Provision 2 are alternative operating models which serve all students free school meals
- CEP and Provision 2 (in non-base years) do not collect free and reduced applications, but rather FEDS forms for At-Risk funding purposes (as needed)
- For audit purposes, all meal eligibility (applications, FEDS forms and direct certification lists) must be maintained

Categorical Eligibility Determinations

- Students determined eligible for the following must be reported as free lunch eligible in the October Count submission:
 - Foster Children
 - Migrant Students
 - Homeless or Runaway Students
 - Head Start
- Categorical eligibilities must be confirmed via a district liaison list. Lists must contain student name and eligibility date
- 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 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
- Must document:
 - Originally directly certified student
 - Basis of extension (add siblings form/same address/application)
 - Date of extension
 - Initials

Immigrant/Migrant Families



- Clarification of Public Charge Final Rule
- Applying for free or reduced-price school meals is not considered a public charge
- Will not affect the probability of household members receiving a green card or visa
- Important to communicate to district staff and households



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
 - Do not participate 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
- Ensure nutrition records are syncing properly with your district's student information system (SIS)





- At the district and school level, 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
- During the October 2018 Student October data collection, 2,200 directly certified students were not 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 have been submitted
- Districts are encouraged to:
 - Compare year over year free and reduced lunch eligible percentages (at the district and school level) 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 in the base year retain the free status throughout the provision cycle



Annual Checks



- Ensure all software are updated for the current/new school year
 - Use the “Start of Year Checklist” for free and reduced-price 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

At-Risk
Funding/Title 1

October 1
Count Data

Grant
Qualifications

Nutrition
Program
Qualification –
Snack,
Summer, FFVP,
BAB, Severe
Need

Provisional
Programs

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

Phone: 303-866-6805

Email: 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) and Benjamin Wetherbee (provisional programs)

Phone: 303-866-6450; 303-866-6529

Email: burnham_r@cde.state.co.us; wetherbee_b@cde.state.co.us

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

Data Services Unit (Data Pipeline)

Genevieve Hale

Phone: 303-866-6970

Email: hale_g@cde.state.co.us

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

