



**COLORADO**  
Department of Education

# 2018 At-Risk/Free Lunch Count Audit Resource Guide

## Fiscal Year 2018-2019

Submitted to:

Colorado Public School Districts, Charter Schools, Charter School Collaboratives, Charter School Networks, The Charter School Institute (CSI) and Colorado Boards of Cooperative Educational Services (BOCES)

By:

Colorado State Board of Education  
School Finance and Operations Division

Katy Anthes, Ph.D.      Commissioner of Education  
Jennifer Okes          Chief Operating Officer

Aaron Oberg          Director, School Finance Unit

**School Auditing Office**

Rebecca McRee      Operations Lead  
Aaron Chesler      Auditor  
Mary Bello          Auditor  
Alan Shimmin      Auditor

July 1, 2018

Colorado Department of Education  
201 E. Colfax Ave., Denver, CO 80203  
303-866-6600  
[www.cde.state.co.us](http://www.cde.state.co.us)



## Colorado State Board of Education

---

[www.cde.state.co.us/cdeboard](http://www.cde.state.co.us/cdeboard)

**Angelika Schroeder**

Chairwoman

2nd Congressional District, Boulder

Terms of Office: January 2009 – January 2019

**Joyce Rankin**

Vice-Chair

3rd Congressional District, Carbondale

Terms of Office: August 2015 – January 2023

**Valentina (Val) Flores**

1st Congressional District, Denver

Terms of Office: January 2015 – January 2021

**Debora Scheffel**

4th Congressional District, Parker

Terms of Office: March 2018 – January 2019

**Steve Durham**

5th Congressional District, Colorado Springs

Terms of Office: January 2015 – January 2023

**Rebecca McClellan**

6th Congressional District, Parker

Terms of Office: January 2017 – January 2023

**Jane Goff**

7th Congressional District, Arvada

Terms of Office: March 2008 – January 2021

**Katy Anthes, Ph.D.**

Commissioner of Education

Secretary to the Board of Education

**Elizabeth (Bizy) Cordial**

Director of State Board Relations

For additional information, e-mail: [state.board@cde.state.co.us](mailto:state.board@cde.state.co.us)



## Table of Contents

---

Statutory Authority.....	1
Data Privacy and Security.....	1
Introduction and Overview .....	2
Data Collection and Audit Process .....	3
Income Eligibility Guidelines .....	7
SNAP/TANF Direct Certification Lists.....	8
Application for Free and Reduced Price School Meals.....	9
Family Economic Data Survey (FEDS) Form.....	11
Categorical Eligibility Determinations .....	13
Special Assistance Certification and Reimbursement Alternative .....	15
Sampling Process.....	17

► Pointers mark information that is new or provides additional clarification



---

## Statutory Authority

---

[Section 22-54-103, C.R.S.](#), grants the state board authority to “make reasonable rules and regulations necessary for the administration and enforcement” of the Public School Finance Act of 1994.

The Rules for the Administration of the Public School Finance Act of 1994 are published in [1 CCR 301-39](#).

Colorado Revised Statutes, [www.lexisnexis.com/hottopics/colorado/](http://www.lexisnexis.com/hottopics/colorado/)  
Code of Colorado Regulations, [www.sos.state.co.us/CCR/Welcome.do](http://www.sos.state.co.us/CCR/Welcome.do)

*You must open your browser to “[Colorado Legal Resources](#)” before clicking any link to a statutory reference*



---

## Citations

---

[Section 22-32-141, C.R.S.](#)

[Section 22-54-109, C.R.S.](#)

[Section 22-54-112\(4\), C.R.S.](#)

[http://www.cde.state.co.us/cdefinance/auditunit\\_atrisk\\_freeandreduced](http://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced)

<http://www.cde.state.co.us/nutrition/nutrifreeandreducedprocesses>

---

## Data Privacy and Security

---

Local education agencies must use secure means when sending Personally Identifiable Information (PII) to CDE. If transferring PII between districts, schools, or with other parties, CDE strongly recommends that you send PII via a secure method. For example, an encrypted email, a secure file sharing tool like Syncplicity, or including the PII in a password protected document. If you have questions, contact CDE’s Data Privacy Office at [dataprivacy@cde.state.co.us](mailto:dataprivacy@cde.state.co.us).

For additional information on the department’s use of Syncplicity and its security functions, please contact [dataprivacy@cde.state.co.us](mailto:dataprivacy@cde.state.co.us).

Data Privacy and Security, CDE. <http://www.cde.state.co.us/dataprivacyandsecurity>



---

## Introduction and Overview

---

The 2018 edition of the At-Risk/Free Lunch Audit Resource Guide (Guide) is a publication of the State Board of Education.

The purpose of this guide is to provide helpful information to assist districts in preparing for their at-risk/ free lunch count audit. With the emergence of new technology capabilities, it is recommended whenever possible that districts retain their audit documentation in electronic format.

While the Guide has been developed to conform to state statute and the Code of Colorado Regulations (administrative rules), the Guide is not meant to be comprehensive and is not intended to replace state statute or administrative rules.

All references to “district” or “school district” includes the Charter School Institute (CSI), charter schools, charter school collaboratives, charter school networks, and BOCES. Each organization is encouraged to review all relevant sections of the Guide, state statute and administrative rules.

---

### How to Utilize the Guide

---

Within each Section of the Guide, there may be subsections marked by icons to assist districts in identifying relevant information if applicable.



---

#### What is Unique?

---

Provides an overview or description of the topic being covered in the noted subsection of this guide.



---

#### Funding and Audit Documentation Requirements

---

Lists the requirements and audit documentation to support the free-lunch eligibility described in the previous section



---

#### Frequently Asked Questions and Helpful Hints

---

Addresses frequently asked questions and provides helpful hints



---

## Data Collection and Audit Process

---

Each year all public school districts across the state of Colorado participate in the Student October Count data submission to the Colorado Department of Education (CDE). The purpose of this data collection is to obtain required student level data as provided for by state statute, including information regarding students' funding and lunch eligibility status as outlined in the Public School Finance Act of 1994, as amended. The CDE collects this data through the Data Pipeline with the Data Services Office of CDE overseeing the collection.

The Student October Count is based on a one-day membership count in which districts are asked to report all students who are actively enrolled and attending classes through their district on that date (pupil enrollment count date). Membership includes enrollment and attendance. While the submission should only include those students who meet the membership requirements as of the pupil enrollment count date, the actual submission process begins in September and closes at the end of November. (For further information regarding the actual data submission process, please visit [http://www.cde.state.co.us/datapipeline/snap\\_studentoctober](http://www.cde.state.co.us/datapipeline/snap_studentoctober)).

This data not only determines per pupil funding, but also at-risk funding. While several factors come into play when determining a district's at-risk funding, the most significant factor is the total number of funded students reported as free lunch eligible. For every student included in the district's Student October Count data submission, the district must report the student's lunch eligibility status. Applicable codes are as follows:

- 00 = Not eligible/Paid
- 01 = Free lunch eligible
- 02 = Reduced lunch eligible

In an effort to ensure accurate reporting of those data fields associated with per pupil and at-risk funding, the School Auditing Office conducts compliance audits of each district's Student October Count data. When conducting the at-risk/free lunch portion of the compliance audit, a random sample of reported free lunch eligible students is selected for eligibility confirmation.

Districts must retain all required documentation until audited by CDE or until five years from the certification due date (November 10), whichever comes first. Special provision schools (CEP and Provision 2) need to retain documentation for up to nine years because documentation evidencing free lunch eligibility collected beginning with the base year for their students may be used throughout the four-year cycle for Student October Count reporting purposes. (This is true as long as the special provision students continue to be reported at a special provision school).

With the emergence of new technology capabilities, districts should be prepared to provide all audit documentation in electronic format. In most cases, districts should be able to generate and save required reports electronically from their nutrition system, or if needed, scan hard copy documents and save them in an electronic format. Districts should be prepared to provide a copy of the source document at the time of audit.

At no time should any documentation containing personally identifiable information be emailed to CDE.



---

## Pupil Enrollment Count Date

---

The pupil enrollment count date is October 1 of each year, unless that date falls on a Saturday, Sunday, or major religious holiday. If the pupil enrollment count date falls on a Saturday, Sunday, or major religious holiday, the pupil enrollment count date will be the following school day.

Determination of the pupil enrollment count date shall not be affected by a district's decision to not have school on the pupil enrollment count date.

**2018 pupil enrollment count date: Wednesday, October 3**

All current year documentation evidencing free lunch eligibility must be dated on or between July 1 and the pupil enrollment count date in order for the district to report a student as free lunch eligible in the Student October Count data submission.

In the event a district or school is approved for an alternative count date, the district or school must use the alternative count date when determining free lunch eligibility for the Student October Count data submission reporting purposes. All documentation evidencing free lunch eligibility in this instance should be dated between July 1 and the alternative pupil enrollment count date for the current school year.

Throughout this guide, in the event a district or school has been granted an alternative count date, said date should be used wherever pupil enrollment count date is referenced.

---

## Audit Documentation Requirements

---

For purposes of the at-risk audit, districts must be prepared to provide documentation to support any funded students' free lunch eligibility as reported in the Student October Count data submission. Acceptable documentation to support a student's free lunch eligibility includes:

- SNAP/TANF Direct Certification Lists
- Applications for Free and Reduced Price School Meals
- Family Economic Data Survey (FEDS) forms
- Categorical Eligibility Determination lists (such as district migrant, homeless, runaway, and/or foster child lists)

All documentation submitted to the School Auditing Office during the at-risk/free lunch count audit will be evaluated based on criteria outlined in the United States Department of Agriculture (USDA) [Eligibility Manual for School Meals](#) (Determining and Verifying Eligibility). As a reminder, and as outlined in the Rules for the Administration of the Public School Finance Act of 1994, all current year documentation evidencing free lunch eligibility must be dated on or between July 1 and the pupil enrollment count date, unless the use of the carryover provision is allowable and appropriate.



---

## Carryover Provision and Variance Waivers

---

In the absence of any current year documentation evidencing a student's lunch eligibility status, the district may utilize documentation from the prior school year ("carryover documentation") to evidence a student's lunch eligibility status if the pupil enrollment count date falls within the first 30 school days of the current year.

Carryover of the previous year's lunch eligibility status must be evidenced with adequate audit documentation as outlined in this guide. As is true with the carryover provision, carryover status may only be used up to the 30th school day into the current year or until new eligibility determination is made, either approved or denied.

***Because the new eligibility determination supersedes the carryover eligibility, documentation from the prior year can only be used in the absence of any current year documentation provided to evidence a student's lunch eligibility status, and if the pupil enrollment count date falls within the first 30 school days.***

In cases where students transfer between districts on or before the pupil enrollment count date during the current school year, the USDA does allow for the transfer of lunch eligibility status from one district to another. In such cases, if the receiving district is able to include the student in the Student October Count data submission, the district can report the student's lunch eligibility status from the sending district if it has documentation as to the student's eligibility from the sending district. In the absence of such documentation, the receiving district must obtain new or updated documentation evidencing the student's lunch eligibility.

In the event a district is unable to use prior year carryover documentation to evidence free lunch eligibility because the pupil enrollment count date does not fall within the first 30 days of school, the district may request a variance waiver from the CDE to extend the 30 school day requirement as it relates to the at-risk count only. In the absence of any current year documentation evidencing a student's lunch eligibility status, this waiver will allow the district to use prior year documentation to evidence a student's lunch eligibility status. This variance waiver will not impact the carryover provisions as it relates to the child nutrition program.

All waiver requests for this purpose should outline the reason for the waiver, and must be addressed to, and received by, Jennifer Okes, Chief Operating Officer ([okes\\_j@cde.state.co.us](mailto:okes_j@cde.state.co.us)) no later than September 15.





---

## Extended Eligibility

---

Free lunch eligibility may be extended to students who are not included or listed on the SNAP/TANF direct certification for a given household, but who reside or belong to that household. In such cases, eligibility can only be extended as a result of SNAP or TANF benefits, and not in cases of migrant student status. Students with extended eligibility who are identified on or before the pupil enrollment count date for the current school year may be reported as free lunch eligible in the Student October Count data submission if the district notes the following:

- The date extended eligibility was granted
- The initials or name of the district staff member who granted the extended eligibility
- The name of the household member who appears on the SNAP/TANF direct certification list
- A copy of the SNAP/TANF direct certification list (and/or list date)

As allowed by the CDE's School Nutrition Unit, this information may be documented in one of the following ways:

- In the district's nutrition services system using notes, comments, etc.
- Handwritten on the printed SNAP/TANF direct certification list
- On a separate document that is maintained by the district nutrition services department that contains all applicable information as outlined above
- An "Extended Eligibility to Additional Household Members" letter



---

## Frequently Asked Questions and Helpful Hints

---

- Districts are strongly encouraged to include district staff who may be involved in any portion of the at-risk data collection. Specifically, districts should include pupil count coordinator, nutrition services, homeless/migrant/foster coordinators, business official, and information technology staff.
  - The pupil count coordinator ensures the overall data is included in the final Student October Count data submission.
  - Nutrition services ensures 1) the accurate determination of lunch status and 2) that the final counts in the student information system match the counts in the nutrition point of sale system.
  - The homeless/migrant/foster coordinator(s) work with nutrition services to ensure free lunch status for identified students.
  - The business official needs to be aware of any change in the free lunch count, which directly impacts the district's funding.
  - Information technology staff ensures the proper data link between the point of sale system and the student information system through to data pipeline.



## Income Eligibility Guidelines

# Income Eligibility Guidelines

(Effective from July 1, 2018 to June 30, 2019)

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	\$15,782	\$1,316	\$658	\$607	\$304	\$22,459	\$1,872	\$936	\$864	\$432
2	\$21,398	\$1,784	\$892	\$823	\$412	\$30,451	\$2,538	\$1,269	\$1,172	\$586
3	\$27,014	\$2,252	\$1,126	\$1,039	\$520	\$38,443	\$3,204	\$1,602	\$1,479	\$740
4	\$32,630	\$2,720	\$1,360	\$1,255	\$628	\$46,435	\$3,870	\$1,935	\$1,786	\$893
5	\$38,246	\$3,188	\$1,594	\$1,471	\$736	\$54,427	\$4,536	\$2,268	\$2,094	\$1,047
6	\$43,862	\$3,656	\$1,828	\$1,687	\$844	\$62,419	\$5,202	\$2,601	\$2,401	\$1,201
7	\$49,478	\$4,124	\$2,062	\$1,903	\$952	\$70,411	\$5,868	\$2,934	\$2,709	\$1,355
8	\$55,094	\$4,592	\$2,296	\$2,119	\$1,060	\$78,403	\$6,534	\$3,267	\$3,016	\$1,508
For each additional family member add	\$5,616	\$468	\$234	\$216	\$108	\$7,992	\$666	\$333	\$308	\$154
Error Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$1,200	\$100	\$50	\$44	\$24



---

## SNAP/TANF Direct Certification Lists

---



Any student who appears on a district SNAP/TANF direct certification list, ran on or between July 1 and the pupil enrollment count date for the current school year, may be reported as free lunch eligible in the Student October Count data submission.



---

## Funding and Audit Documentation Requirements

---

If any student is identified as free lunch eligible in the Student October Count data submission as evidenced by a SNAP/TANF direct certification list, the district must retain all applicable documentation until after the completion of the at-risk/free lunch count audit for the given school year.

Documentation includes, but is not limited to:

- SNAP/TANF direct certification lists generated on or between July 1 and the pupil enrollment count date for the current school year
- Documentation to support extended eligibility based on a SNAP/TANF direct certification list (with the accompanying SNAP/TANF direct certification list, if applicable)
- Documentation evidencing carryover provision eligibility (as well as the carryover documentation from the prior school year, if applicable)
  - District calendar showing the pupil enrollment count date fell within the first 30 school days for the current school year OR
  - Letter from the CDE stating that the district's request for a variance waiver to the carryover provision was granted



---

## Frequently Asked Questions and Helpful Hints

---

- In order to ensure inclusion of all possible free lunch eligible students in the at-risk/free lunch count and to maximize at-risk funding, it is recommended that the district's nutrition services unit run SNAP/TANF direct certification uploads monthly after each new file is available. Additionally, districts are encouraged to run a SNAP/TANF direct certification upload in July, August, September, and on the pupil enrollment count date. Any upload conducted for Student October Count purposes (on or before the pupil enrollment count date) is in addition to the October upload required by the CDE's School Nutrition Unit to support the child nutrition programs



---

## Application for Free and Reduced Price School Meals

---



If a student is identified as free lunch eligible through the completion of an Application for Free and Reduced Price School Meals, the student may be reported as such in the district's Student October Count data submission. The district must ensure that the application is filled out correctly and completely, as well as processed accordingly by the district.

During the at-risk/free lunch count audit, the School Auditing Office will review applications for all applicable students included in the at-risk count sample to ensure that, at a minimum, the following information is completed as appropriate:

- The application is for the current school year
- All students are included on the application (first and last name)
- Household income is stated (if applicable)
- Signature of an adult member of the household
- The date the application was completed or received by the district (on or between July 1 and the pupil enrollment count date)

In the event an application states the student is (1) a foster child, (2), homeless, (3) migrant, or (4) a runaway, the student is automatically eligible for free lunch. Additionally, if the application states that the household is receiving SNAP, FDPIR, or TANF (Temporary Aid to Needy Families) benefits, and an appropriate case number for any of the above is included, all students listed on the application may be reported as free lunch eligible. In any of these cases, the application must be signed and dated appropriately in order to avoid an at-risk/free lunch count audit exception.

State statute requires every school to include the federal Application for Free and Reduced Price Meals (or the state Family Economic Data Survey form as appropriate) in its registration materials. The materials shall include an explanation that these documents will be used to determine whether the school is eligible for at-risk funding on behalf of the pupil, and by filling out the form, the parent is ensuring the district or school will receive at-risk funding which it is entitled.



---

## Funding and Audit Documentation Requirements

---

If any student is identified as free lunch eligible in the Student October Count data submission as evidenced by an Application for Free and Reduced Priced School Meals, the district must retain all applicable documentation until after the completion of the at-risk/free lunch count audit for the given school year.

Documentation includes, but is not limited to:

- Applications for Free and Reduced Priced School Meals completed or received on or between July 1 and the pupil enrollment count date for the current school year
- Documentation evidencing carryover provision eligibility (as well as the applicable carryover documentation from the prior school year, if applicable)
  - District calendar showing the pupil enrollment count date fell within the first 30 school days for the current school year OR
  - Letter from the CDE stating that the district's request for a variance waiver to the carryover provision was granted



---

## Frequently Asked Questions and Helpful Hints

---

- In the event a district accepts online applications, the documentation provided by the district must include all information included on a paper version of the application. In place of a signature and date, the online application data must include the name of the individual completing the online application, appropriate evidence of signature, and the date and time the application was electronically submitted
- Districts should ensure that total household income is being calculated correctly, especially if there are multiple household incomes that occur at varying frequencies
- Districts should ensure that all members of the household are listed on the application and that children listed in both the student and household sections be counted only once in the total household size



---

## Family Economic Data Survey (FEDS) Form

---



The Family Economic Data Survey (FEDS) should be used for students attending schools and/or districts: (1) not participating in the child nutrition programs and/or (2) participating in the Community Eligibility Provision (CEP) (including the base year), or Provision 2 program (following the base year).

If a student is identified as free lunch eligible through the completion of a Family Economic Data Survey form, the student may be reported as such in the district's Student October Count data submission. The district must ensure the form is filled out correctly and completely, as well as processed accordingly by the district.

Since the intent of the FEDS form is to mirror the Application for Free and Reduced Price School Meals, these forms will be evaluated in the same manner. As such, during the at-risk/free lunch count audit, the School Auditing Office will review FEDS forms for all applicable students included in the at-risk count sample to ensure that, at a minimum, the following information is completed as appropriate:

- The form is for the current school year
- All students are included on the form (first and last name)
- Household income is stated (if applicable)
- Signature of an adult member of the household
- The date the form was completed or received by the district (on or between July 1 and the pupil enrollment count date)

In the event a form states the student is (1) a foster child, (2), homeless, (3) migrant, or (4) a runaway, then the student is automatically eligible for free lunch. Additionally, if the form states that the household is receiving SNAP, FDPIR, or TANF (Temporary Aid to Needy Families) benefits, and an appropriate case number for any of the above is included, all students listed on the form may be reported as free lunch eligible. In any of these cases, the form must be signed and dated appropriately in order to avoid an at-risk/free lunch count audit exception.

State statute requires every school to include the federal Application for Free and Reduced Price Meals (or the state Family Economic Data Survey form as appropriate) in its registration materials. The materials shall include an explanation that these documents will be used to determine whether the school is eligible for at-risk funding on behalf of the pupil, and by filling out the form, the parent is ensuring the district or school will receive at-risk funding which it is entitled.



---

## Funding and Audit Documentation Requirements

---

If any student is identified as free lunch eligible in the Student October Count data submission as evidenced by a FEDS form, the district must retain all applicable documentation until after the completion of the at-risk/free lunch count audit for the given school year.

Documentation includes, but is not limited to:

- Family Economic Data Survey forms completed or received on or between July 1 and the pupil enrollment count date for the current school year
- Documentation evidencing carryover provision eligibility (as well as the applicable carryover documentation from the prior school year, if applicable)
  - District calendar showing the pupil enrollment count date fell within the first 30 school days for the current school year OR
  - Letter from the CDE stating that the district's request for a variance waiver to the carryover provision was granted



---

## Frequently Asked Questions and Helpful Hints

---

- In the event a district accepts online FEDS forms, the documentation provided by the district must include all information included on a paper version of the form. In place of a signature and date, the online form data must include the name of the individual completing the online form, appropriate evidence of signature, and the date and time the form was electronically submitted
- Districts cannot use funds received from the National School Lunch and School Breakfast Programs to process Family Economic Data Survey forms
- Districts should ensure that total household income is being calculated correctly, especially if there are multiple household incomes that occur at varying frequencies
- Districts should ensure that all members of the household are listed on the form and that children listed in both the student and household sections be counted only once in the total household size
- If information provided on a FEDS form is inconsistent or incomplete, districts should determine a verification process for verifying information submitted on the FEDS form.



---

## Categorical Eligibility Determinations

---



Students identified with a categorical designation on or between July 1 and the pupil enrollment count date for the current school year should be reported as free lunch eligible in the Student October Count data submission. Such categories include students who are identified as foster children, homeless, migrant, or runaway. Documentation provided by the district at the time of audit must show that the student with a categorical designation was identified as such on or before the pupil enrollment count date of the current school year.

---

### Foster Children

---

If a student is identified as foster on an Application for Free and Reduced Price School Meals, the Family Economic Data Survey form, or a foster list/letter confirming foster status from a state agency, local agency or a court on or before the pupil enrollment count date, then the student should be reported as free lunch eligible in the Student October Count data submission. Further, if CDE identifies the student as a foster child during the Student October Count data submission, the district should ensure that the student is reported as free lunch eligible, and retain the CDE Data Pipeline Error Report as evidence of foster child status for serving free breakfast and/or lunch to the student.

---

### ► Migrant Students

---

If a student has been identified as migrant by the district's Migrant Education Program Director using guidelines established under Section 107 of the Child Nutrition and WIC Reauthorization Act of 2004, and was included on the district's Migrant List on or before the pupil enrollment count date, then the student should be reported as free lunch eligible in the Student October Count data submission.

---

### ► Homeless or Runaway Students

---

If a student has been identified as homeless or runaway by the district's Homeless Liaison using guidelines established under McKinney-Vento Act, and was included on the district's Homeless or Runaway list on or before the pupil enrollment count date, then the student should be reported as free lunch eligible in the Student October Count data submission.





---

## Funding and Audit Documentation Requirements

---

If any student is identified as free lunch eligible in the Student October Count data submission based on a categorical designation, the district must retain all applicable documentation until after the completion of the at-risk/free lunch count audit for the given school year.

- Applications for Free and Reduced Priced School Meals and/or Family Economic Data Survey forms completed or received between July 1 and the pupil enrollment count date for the current school year
- Foster child, homeless, runaway, or migrant student lists dated on or before the pupil enrollment count date
- Documentation evidencing carryover provision eligibility (as well as the applicable carryover documentation from the prior school year, if applicable)
  - District calendar showing the pupil enrollment count date fell within the first 30 school days for the current school year OR
  - Letter from the CDE stating that the district's request for a variance waiver to the carryover provision was granted



---

## Frequently Asked Questions and Helpful Hints

---

- In the event there are multiple students listed on an Application for Free and Reduced Priced School Meals or Family Economic Data Survey form, and only some of them are identified as being categorically eligible (i.e., there is one foster child student in a household where there are five total students), the remaining students are only eligible for free lunch if the household income level requirement has been met, and if the Application/FEDS form is completed correctly and dated appropriately



---

## Special Assistance Certification and Reimbursement Alternative

---

---

### Community Eligibility Provision (CEP) and Provision 2

---



---

#### What is Unique?

---

For districts that have schools participating in Community Eligibility Provision (CEP) or Provision 2, the free and reduced lunch status reported in the Student October Count data submission may not match the status in the district's point of sale system.

While all students attending these schools are eligible to eat meals for free, the district can only report the student as free lunch eligible if:

***It has documentation for the student evidencing free lunch eligibility that is dated any time between, and including, the base year through the pupil enrollment count date of the current Student October Count data submission (usually July 1 of the base year through Oct. 1 of the current school year) not to exceed the four-year cycle.***

Once the student is identified as free lunch eligible during this time frame, the student can continue to be reported as free lunch eligible in each subsequent Student October Count data submission through the final year of the cycle.

For at-risk funding purposes, the district must:

- Collect documentation for all students during the base year
- For students who are not identified as free lunch eligible in the base year, collect documentation in each subsequent year, through the 4<sup>th</sup> and final year of the cycle, or until the student is identified as free lunch eligible

***In the event a CEP or Provision 2 district/school resets its base year, all new base year documentation must be collected.***



---

## Funding and Audit Documentation Requirements

---

If any student attending a CEP or Provision 2 district/school is identified as free lunch eligible in the Student October Count data submission based on documentation listed below, the district must retain this documentation until after the completion of the at-risk/free lunch count audit for the given school year.

CEP (base year through the completion of the 4-year cycle)

- SNAP/TANF Direct Certification Lists
- Family Economic Data Survey form
- Foster Child, Migrant, Homeless, Runaway, Head Start Lists

Provision 2

- Application for Free and Reduced Priced School Meals (base year only)
- Family Economic Data Survey form (years 2-4 only)
- SNAP/TANF Direct Certification Lists
- Foster Child, Migrant, Homeless, Runaway, Head Start Lists



---

## Frequently Asked Questions and Helpful Hints

---

- If during the base year a CEP or Provision 2 student is not identified as eligible for free lunch on or between July 1 and the pupil enrollment count date, the district should continue to monitor these students to determine if they may be eligible to be reported as free lunch eligible in subsequent Student October Count data submissions during the four-year cycle.
- If students transfer into one of these districts or schools after the base year Student October Count data submission, the district will need to have documentation evidencing free lunch eligibility for that student in order to submit them as such in subsequent Student October Count data submissions
- Districts with CEP and Provision 2 schools should ensure that they have a process in place for tracking lunch eligibility status in the Student October Count data submission for students reported at these schools as this status may differ from the student's actual eligibility status for the National School Lunch and School Breakfast Programs
- Districts cannot use funds received from the National School Lunch and School Breakfast Programs to process Family Economic Data Surveys
- District nutrition service staff should coordinate with the district Pupil Count or Student October Count coordinator to ensure accurate reporting and collection of required audit documentation
- CEP/Provision 2 districts and schools are encouraged to communicate with parents the value in completing the Family Economic Data Survey form which may include specific intended usage for determining additional at-risk funding available to the school



---

## Sampling Process

---

**Step 1.** Identify the student population subject to sampling based on the following criteria:

- Reported in grades K-12
- Submitted for per pupil funding
- Reported as free lunch eligible
- Not identified by the CDE as at-risk based on factors other than lunch eligibility status
- Not reported/identified as Migrant, Homeless/Runaway, or Foster
- Did not appear on a district ran SNAP/TANF direct certification list ran on or between July 1 and the pupil enrollment count date

**Step 2.** For each student, assign a risk indicator based on reported prior year FRL status and current year FRL status. In descending order of risk, the risk indicators are:

- Paid prior year to Free current year [Highest risk]
- Not reported prior year to Free current year
- Reduced prior year to Free current year
- Free prior year to Free current year [Lowest risk]

**Step 3.** Separate the populations into two sub-populations: (1) reported at a CEP school or Provision 2 school or (2) reported at a non-participating CEP school

**Step 4.** For each subpopulation identified in Step 3, select a random sample of students. The sample size varies based on the risk indicator identified in Step 2.

► **Error rates.** If the School Auditing Office identifies a significant misidentification of students' free lunch status, the sample will be expanded.