



COLORADO
Department of Education

2020 At-Risk/Free Lunch Count Audit Resource Guide

Fiscal Year 2020-2021

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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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/
Code of Colorado Regulations, 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

References

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

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

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

[7 CFR 245.6](#)

http://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced

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

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

Data Privacy and Security

As a reminder, local education agencies must use secure means when sending Personally Identifiable Information (PII) to CDE. CDE strongly recommends that districts use a secure method if transferring PII between districts, schools, or with other parties. For example, an encrypted email, a secure file sharing tool like Syncplicity, or including the PII in a password protected document. For more information, please contact CDE’s Data Privacy Office at 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.

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



Introduction and Overview

The purpose of the 2020 edition of the At-Risk/Free Lunch Audit Resource Guide (“Guide”) is to provide helpful information to assist districts in preparing for their at-risk/free lunch count audit. With the emergence of new technological capabilities, it is recommended whenever possible that districts retain their audit documentation in electronic format.

While this Guide has been developed to conform to state statute and the Code of Colorado Regulations (Administrative Rules), this document 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.



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 student-level data required 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). 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.)

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

- 00 = Not Eligible
- 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) may need to retain documentation for up to nine years, because documentation evidencing free lunch eligibility collected during the base year 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.)

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

At no time should any documentation containing Personally Identifiable Information (PII) 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.

The 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.

2020 Pupil Enrollment Count Date: Thursday, October 1

All current year documentation evidencing free lunch eligibility must be received 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, all documentation evidencing free lunch eligibility (in this instance) should be received 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 the purpose 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 and Migrant Direct Certification lists
- Applications for Free and Reduced-Price School Meals
- Family Economic Data Survey (FEDS) forms
- Categorical Eligibility determination lists (such as district-created migrant, homeless, Head Start, 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](#). 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

If the pupil enrollment count date falls within the first 30 school days of the current year, the district may utilize documentation from the prior school year (“carryover documentation”) to evidence a student’s lunch eligibility status. 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 a 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.***

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 demonstrating 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 (only as it relates to the at-risk count). 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 only pertains to lunch eligibility status reporting in Student October and will not impact the Carryover Provision as it relates to the child nutrition program.

All waiver requests submitted for consideration should outline the reason for the waiver and must be addressed to, and received by Chief Operating Officer Jennifer Okes (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 list for a given household, but who reside in 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 or foster 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)
- Basis of extension (same household address, application, or “Extended Eligibility to Additional Household Members” letter)

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 a printed SNAP/TANF Direct Certification list
- On a separate document (typically an Excel spreadsheet) 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

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/Head Start/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 the accurate determination of lunch status and that the final counts in the student information system match the counts in the nutrition point of sale system.
- The homeless/migrant/Head Start/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 2020-2021

Household Size	Free Guidelines					Reduced-Price Guidelines				
	Yearly	Monthly	2x/Month	Every Other Week	Weekly	Yearly	Monthly	2x/Month	Every Other Week	Weekly
1	\$16,588	\$1,383	\$692	\$638	\$319	\$23,606	\$1,968	\$984	\$908	\$454
2	\$22,412	\$1,868	\$934	\$862	\$431	\$31,894	\$2,658	\$1,329	\$1,227	\$614
3	\$28,236	\$2,353	\$1,177	\$1,086	\$543	\$40,182	\$3,349	\$1,675	\$1,546	\$773
4	\$34,060	\$2,839	\$1,420	\$1,310	\$655	\$48,470	\$4,040	\$2,020	\$1,865	\$933
5	\$39,884	\$3,324	\$1,662	\$1,534	\$767	\$56,758	\$4,730	\$2,365	\$2,183	\$1,092
6	\$45,708	\$3,809	\$1,905	\$1,758	\$879	\$65,046	\$5,421	\$2,711	\$2,502	\$1,251
7	\$51,532	\$4,295	\$2,148	\$1,982	\$991	\$73,334	\$6,112	\$3,056	\$2,821	\$1,411
8	\$57,356	\$4,780	\$2,390	\$2,206	\$1,103	\$81,622	\$6,802	\$3,401	\$3,140	\$1,570
For each additional family member add	\$5,824	\$486	\$243	\$224	\$112	\$8,288	\$691	\$346	\$319	\$160
Error-Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24	\$1,200	\$100	\$50	\$44	\$24



SNAP/TANF and Migrant Direct Certification Lists

Any student who appears on a district SNAP/TANF and Migrant Direct Certification list, processed 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 and Migrant 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 and Migrant 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 maximize at-risk funding, it is recommended that the district's nutrition services unit run Direct Certification uploads monthly after each new file is made available by the School Nutrition Unit. Additionally, districts are encouraged to run a 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, and that it is accurately processed by district staff.

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, at a minimum, the following:

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

If a school or district is accepting electronic applications, the information above must be personally entered by the signing household member or with the household member present; school or district staff are not permitted to sign applications on behalf of family members.

In the event an application indicates a student is a foster child the student is automatically eligible for free lunch and no further verification is required. Students who are identified as homeless, migrant, participating in Head Start, or runaway on an application are eligible for free lunch; however, prior to being approved for free school meals, the above statuses must be confirmed by a school district liaison. Additionally, if the application states that the household is receiving SNAP, FDPIR, or TANF (Temporary Assistance for 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 as described above in order to avoid an at-risk/free lunch count audit exception.

Appropriate Case Number Formats:

- SNAP/TANF: These case numbers are 7 alphanumeric characters that start with "1B"
- FDPIR (Food Distribution Program and Indian Reservation): This case number is a 9-digit numeric number

[CRS 22-54-112\(4\)\(a\)](#) requires every **participating** site or school to include the federal Application for Free and Reduced-Price Meals (or the state's 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 the at-risk funding to 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-Price 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-Price School Meals 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

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. An Audit Documentation Quick Reference can be found at the School Auditing Office [At-Risk website](#).
- 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.
- If information provided on an application is inconsistent or incomplete, districts should develop a process for verifying information submitted on the application.



Family Economic Data Survey (FEDS) Form

The Family Economic Data Survey (FEDS) should be used for students attending schools and/or districts that are either not participating in a child nutrition program, or are participating in the Community Eligibility Provision (CEP) or Provision 2 program. (Schools participating in CEP may use the FEDS form for reporting any year within the 4-year cycle; schools participating in the Provision 2 program should use the form in the years following the base year.)

If a student is identified as free lunch eligible through the completion of a FEDS 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 accurately processed 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 using the same criteria. 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, at a minimum, the following:

- Each 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 received by the district (on or between July 1 and the pupil enrollment count date).

If a school or district is accepting electronic applications, the information above must be personally entered by the signing household member or with the household member present; school or district staff are not permitted to sign applications on behalf of family members.

In the event a form indicates a student is a foster child the student is automatically eligible for free lunch and no further verification is required. Students who are identified as homeless, migrant, participating in Head Start, or runaway on a form are eligible for free lunch; however, prior to being approved for free school meals, the above statuses must be confirmed by a school district liaison. Additionally, if the form states that the household is receiving SNAP, FDPIR, or TANF (Temporary Assistance for 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 as described above in order to avoid an at-risk/free lunch count audit exception.

Appropriate Case Number Formats:

- SNAP/TANF: SNAP/TANF: These case numbers are 7 alphanumeric characters that start with "1B"
- FDPIR (Food Distribution Program and Indian Reservation): This case number is a 9-digit numeric number

[CRS 22-54-112\(4\)\(b\)](#) requires every **non-participating** site or school to include the Family Economic Data Survey form in its registration materials. (Federal law prohibits non-participating schools or sites to distribute Applications for Free and Reduced-Price Meals.) 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 the at-risk funding to 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:

- FEDS 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

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 FEDS 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 are counted only once in the total household size.
- If information provided on a FEDS form is inconsistent or incomplete, districts should develop a 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, Head Start participant, 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

A student identified as foster (on an Application for Free and Reduced-Price School Meals, the FEDS 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, should be reported as free lunch eligible in the Student October Count data submission.

If CDE identifies the student as a foster child during the Student October Count data submission, the district should report the student 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

A student identified as migrant (on a SNAP/TANF and Migrant Direct Certification list or 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 included on the district's Migrant List on or before the pupil enrollment count date, should be reported as free lunch eligible in the Student October Count data submission.

- ▶ Only a district's Migrant Education Program Director may include a student on the Migrant List. For audit purposes, school nutrition system status reports are **not** sufficient documentation of Migrant designation.

Homeless or Runaway Students

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

- ▶ Only a district's Homeless Liaison may include a student on the Homeless or Runaway List. For audit purposes, school nutrition system status reports are **not** sufficient documentation of Homeless or Runaway designation.

Head Start Students

A student should be reported as free lunch eligible in the Student October Count data submission if the student was identified as having been enrolled in any of the following, using eligibility criteria identical to or more stringent than federal Head Start requirements:

- Federally-funded Head Start; or
- Comparable state-funded Head Start or pre-kindergarten program; or
- Indian Tribal Organization-funded Head Start or pre-kindergarten program

To be eligible for at-risk funding, student participating in Head Start must have been included on a list from the appropriate school official on or before the pupil enrollment count date.



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-Price School Meals and/or FEDS forms completed or received between July 1 and the pupil enrollment count date for the current school year
- Foster child, migrant, homeless, runaway, or Head Start student lists dated on or before the pupil enrollment count date
 - ► Because Categorical Eligibility student lists must be maintained by appropriate district personnel, nutrition system reports are not considered sufficient documentation of Migrant, Homeless, or Runaway designation for audit purposes. Therefore, district nutrition and/or categorical eligibility liaisons must retain these lists until after the district's at-risk audit has been completed.
- 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

Helpful Hints

- In the event there are multiple students listed on an Application for Free and Reduced-Price School Meals or FEDS form, and only some of them are identified as being categorically eligible (e.g. 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

For districts that have schools participating in the Community Eligibility Provision (CEP) or Provision 2 programs, the free and reduced-price lunch status for a student 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 October 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; and
- Collect, for students who are not identified as free lunch eligible in the base year, documentation in each subsequent year through the 4th 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 and Migrant Direct Certification Lists
- FEDS form
- Foster Child, Migrant, Homeless, Runaway, Head Start Lists

Provision 2

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



Helpful Hints

- If, during the base year of participation, 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 a participating district or school 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 FEDS forms.
- 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 of completing the FEDS form, which may include information about potential benefits to the school or district, such as additional at-risk funding available to the district, etc.



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 any district-run SNAP/TANF and Migrant Direct Certification list 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]
- Reduced-price prior year-to-Free current year
- Not reported 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.

Reporting Errors. If the School Auditing Office identifies a significant misidentification of students' free lunch statuses, the sample will be expanded.