



# 2017 At-Risk/Free Lunch Count Audit Resource Guide

# Fiscal Year 2017-2018

#### 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**

C.R.S. § 22-54-103 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, <u>www.lexisnexis.com/hottopics/colorado/</u> Code of Colorado Regulations, <u>www.sos.state.co.us/CCR/Welcome.do</u>



## Introduction and Overview

The 2017 edition of the <u>At-Risk/Free Count Audit Resource Guide</u> (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.



#### Overview

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



## Reference

References the applicable statutory or administrative rule



## 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 Snapshot 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 states as outlined in the Public School Finance Act of 1994, as amended. The Colorado Department of Education 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 <a href="http://www.cde.state.co.us/datapipeline/snap-studentoctober">http://www.cde.state.co.us/datapipeline/snap-studentoctober</a>).

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 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:

- 0 = Not eligible/Paid
- 1 = Free lunch eligible
- 2 = Reduced lunch eligible

In an effort to ensure accurate reporting of those data fields associated with per pupil and at-risk funding, the Field Analyst Support Team (FAST) of the Office of School Finance 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. These samples generally include between 25 and 280 students for a given year.

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 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.

2017 pupil enrollment count date: Monday, October 2

All current year documentation evidencing free lunch eligibility must be dated on or before 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 in this instance should be dated on or before 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 Direct Certification Lists
- Applications for Free and Reduced Price School Meals
- Family Economic Data Survey (FEDS) forms
- Categorical Eligibility Determinations (such as district migrant, homeless, runaway, and/or foster child lists)

All documentation submitted to the FAST 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 documentation evidencing free lunch eligibility must be dated on or before the pupil enrollment count date, unless the use of carryover provision is allowable and appropriate.



## **Carryover Provision and Variance Waivers**

In the absence of current year documentation, the district may utilize carryover documentation evidencing free lunch eligibility if the pupil enrollment count date falls within the first 30 school days of the current year. Carryover of the previous year's eligibility applies to all adequate audit documentation as outlined in the following pages. Carryover is for up to the 30th school day into the current year or until new eligibility determination is made, either approved or denied. *The new eligibility determination supersedes the carryover eligibility.* 

In cases where students transfer between districts on or before the pupil enrollment count date, 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 eligibly status from the sending district if it has documentation in writing as to the student's eligibility. In the absence of written 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 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 to extend the 30 school day requirement as it relates to the at-risk count <u>only</u>. Such a variance waiver will <u>not</u> 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, Aaron Oberg, School Finance Director (oberg a@cde.state.co.us) no later than Sept. 15.

## **Extended Eligibility**

Free lunch eligibility may be extended to students who are not included or listed on the source documentation for a given household, but who reside or belong to that household. Students with extended eligibility who are identified on or before the pupil enrollment count date for the current 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 source documentation
- The source document type, along with applicable date
  - o Source document includes:
  - SNAP Direct Certification Lists (with the run/generate date of the list)

As allowed by the CDE Office of School Nutrition, 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 source document
- On a separate document that is maintained by the district nutrition services department that contains all applicable information as outlined above





## Reference

Section 22-4-103(1.5), C.R.S.
Section 22-54-103(9.5),(10.5)(a),(10)(d)(II), C.R.S.
1 CCR 301-39-1.10, 3.00, 4.00
1 CCR 301-39-6.00
http://www.cde.state.co.us/cdefinance/auditunit\_atrisk\_freeandreduced
http://www.cde.state.co.us/offices/schoolnutritionoffice



# Income Eligibility Guideline

# Income Eligibility Guidelines

(Effective from July 1, 2017 to June 30, 2018)

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	\$15,678	\$1,307	\$654	\$603	\$302		\$22,311	\$1,860	\$930	\$859	\$430	
2	\$21,112	\$1,760	\$880	\$812	\$406		\$30,044	\$2,504	\$1,252	\$1,156	\$578	
3	\$26,546	\$2,213	\$1,107	\$1,021	\$511		\$37,777	\$3,149	\$1,575	\$1,453	\$727	
4	\$31,980	\$2,665	\$1,333	\$1,230	\$615		\$45,510	\$3,793	\$1,897	\$1,751	\$876	
5	\$37,414	\$3,118	\$1,559	\$1,439	\$720		\$53,243	\$4,437	\$2,219	\$2,048	\$1,024	
6	\$42,848	\$3,571	\$1,786	\$1,648	\$824		\$60,976	\$5,082	\$2,541	\$2,346	\$1,173	
7	\$48,282	\$4,024	\$2,012	\$1,857	\$929		\$68,709	\$5,726	\$2,863	\$2,643	\$1,322	
8	\$53,716	\$4,477	\$2,239	\$2,066	\$1,033		\$76,442	\$6,371	\$3,186	\$2,941	\$1,471	
For each additional family member add	\$5,434	\$453	\$227	\$209	\$105		\$7,733	\$645	\$323	\$298	\$149	
Error Prone Thresholds	\$1,200	\$100	\$50	\$44	\$24		\$1,200	\$100	\$50	\$44	\$24	



## At-Risk/Free Lunch Count Timeline

## October 2017 At-Risk/Free Lunch **Count Timeline** 10/2/2017 PUPIL ENROLLMENT COUNT DAY Identify students eligible for free and reduced price lunches for Student October. Generate a Direct Certification List Report on this date 7/1/2017 - 10/2/2017 Generate and review Direct Certification lists and process Free and Reduced Priced Lunch Applications and FEDS forms 10/1/2017 8/1/2017 9/1/2017 11/1/2017 7/1/2017 - 10/2/2017 Identify Homeless, Migrant, Free and Reduced Price 9/15/2017 eligible students Deadline to request a variance waiver for carryover provision 7/1/2017 Identify if carryover provision may be used by district schools. If not, request a variance waiver COLORADO



## **SNAP Direct Certification Lists**



Any student who appears on a district SNAP direct certification list, ran 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 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 direct certification lists generated between July 1 and the pupil enrollment count date for the current school year
- Documentation to support extended eligibility based on a SNAP direct certification list (with the accompanying SNAP direct certification list, if applicable)
- 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 Colorado Department of Education 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 direct certification uploads monthly after each new file is available. Additionally, districts are encouraged to run a SNAP 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 Colorado Department of Education's Office of School Nutrition to support the child nutrition programs



#### Reference

Section 22-4-103(1.5), C.R.S. 1 CCR 301-39-6.00

http://www.cde.state.co.us/cdefinance/auditunit\_atrisk\_freeandreduced http://www.cde.state.co.us/offices/schoolnutritionoffice



# 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 field analyst will review applications for all 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)
- The last four digits of the social security number of an adult member of the household is listed (if applicable)
- Signature of an adult member of the household
- The date the application was completed or received by the district (on or before 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, then 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 the 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 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 Colorado Department of Education 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 appropriate evidence of signature,
  and the date and time the application was 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 should also take care in the event a child is listed in both the student section and the household section to only include the child once in the total household size



#### Reference

Section 22-4-103(1.5), C.R.S. Section 22-54-112(4), C.R.S. 1 CCR 301-39-6.00



## Family Economic Data Survey (FEDS) Form

While the state Family Economic Data Survey (FEDS) form has historically been used only by those districts and/or schools not participating in the federal child nutrition programs, it can now be used to document eligibility for at-risk funding for districts and/or schools: (1) not participating in the child nutrition programs and (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 field analyst will review FEDS forms for all 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 before 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 the 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 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 Colorado Department of Education 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 application data must include appropriate evidence of signature, and the date and time the
  form was submitted
- Districts cannot use funds received from the National School Lunch and School Breakfast Programs to process Family Economic Data Surveys
- Districts should ensure that total household income is being calculated correctly if there are multiple household incomes that occur at varying frequencies
- Districts should ensure that all members of the household are listed on the FEDS form and should also take care in the event a child is listed in both the student section and the household section to only include the child once in the total household size



## Reference

Section 22-4-103(1.5), C.R.S. Section 22-54-112(4), C.R.S. 1 CCR 301-39-6.00Section 22-35-101, et seq., C.R.S.



## Categorical Eligibility Determinations

Students with a categorical designation may 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

Generally foster children are identified on an Application for Free and Reduced Price School Meals or on the Family Economic Data Survey form. In other instances, districts may receive documentation from a state agency, a local agency or a court identifying district foster children. This documentation may include a listing of foster children or a letter confirming foster status.

#### 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 may be reported as free lunch eligible in the Student October Count data submission. A student may also be reported as free lunch eligible if the student was identified as migrant on either an Application for Free and Reduced Price School Meals or on the Family Economic Data Survey form, and the application or form was completed correctly and dated appropriately.

#### **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 may be reported as free lunch eligible in the Student October Count data submission. A student may also be reported as free lunch eligible if the student was identified as homeless or as a runaway on an Application for Free and Reduced Price School Meals or on the Family Economic Data Survey form, and that form was completed correctly and is dated appropriately.



## **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 Colorado Department of Education 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



#### Reference

Section 22-4-103(1.5), C.R.S. Section 22-54-112(4), C.R.S. 1 CCR 301-39-6.00Section 22-54-109, C.R.S.



# Special Assistance Certification and Reimbursement Alternative

The USDA has developed alternative approaches for certification and reimbursement for the Child Nutrition Programs including (1) Community Eligibility Provision (CEP) and (2) Provision 2. The goal of these provisions is to eliminate or reduce the administrative burden of collecting eligibility documentation and simplify the counting and claiming procedures for reimbursement of school meals.

For CEP districts and schools, participation eligibility is determined based upon a minimum threshold being met as of April 1 in the preceding year of students being identified as free lunch eligible through a SNAP direct certification or homeless, migrant, foster, runaway or Head Start lists. If this threshold is met, and if the district or school decides to participate, no additional documentation (beyond the required yearly SNAP direct certification upload) must be collected beginning in the base year through the 4-year cycle in order for students at those schools to continue eating meals for free.

For Provision 2 schools, eligibility to participate is determined by the percentage of students who are identified as free lunch eligible as evidenced by SNAP direct certification lists and Applications for Free and Reduced Priced School Meals during the base year. Once identified as free lunch eligible in this manner, students at these schools continue to eat meals for free through the 4-year cycle.

For both of these provisions, while the administrative burden of collecting household applications is eliminated for the National School Lunch and School Breakfast Programs, this burden is only reduced, but not eliminated, for at-risk funding purposes.

During the base year, prior to the pupil enrollment count date (usually July 1 through Oct. 1), a CEP or Provision 2 district or school must collect documentation evidencing free lunch eligibility for its students in order to report them as such as in the Student October Count data submission.

In order to align with the goal for CEP and Provision 2, the following is true for students reported at participating CEP and Provision 2 districts and/or schools in the Student October Count data submission ONLY:

If a student is reported at a participating CEP and or Provision 2 district and/or school in the Student October Count data submission, the district can report the student as free lunch eligible if the district has documentation for the student evidencing free lunch eligibility 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.

In the event a CEP or Provision 2 district/school resets its base year, then 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 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 Direct Certification Lists
- Foster Child, Migrant, Homeless, Runaway, Head Start Lists



## Frequently Asked Questions and Helpful Hints

- In the event documentation is not collected evidencing free lunch eligibility prior to the pupil
  enrollment count date of the base year for any student reported at a CEP/Provision 2 district or
  school, 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





## Reference

Section 22-4-103(1.5), C.R.S. Section 22-54-112(4), C.R.S. 1 CCR 301-39-6.00Section 22-32-141, C.R.S.