



**COLORADO**

Department of Education

# Provisional Programs and At-Risk Funding

Jennifer Okes

May 2015

# FRL and October Count

- At-Risk funding is provided by the state to districts for students who are eligible for free lunch pursuant to the provisions of the federal “National School Lunch Act”. (Section 22-54-103, C.R.S.)
- Districts are required to include the application for free or reduced price school meals or the family economic data survey form with registration materials and explain to parents that this will be used to determine if the district is eligible for at-risk funding on behalf of the pupil. (Section 22-54-112(4)(a), C.R.S.)
- Districts shall report to CDE students eligible for free lunch as of the pupil enrollment count date or alternative count date. (1 CCR 301-39, Rule 6.02)

# October Count Reporting

- There has been some confusion about CEP and the October Count data submission. Participation in CEP or Provision 2 does **not** change the October Count data submission requirements.
  - Although all students at a CEP/Provision 2 participating school or district will receive free meals, the students' eligibility still determines the coding for the October Count data submission.
  - Therefore, all students at a CEP/Provision 2 participating school or district should **not** be coded as 01 Free Lunch Eligible.
  - A CEP/Provision 2 participating school or district will have some students coded as 00 Not Eligible, some students coded as 01 Free Lunch Eligible, and some students coded as 02 Reduced Lunch Eligible.

# Eligibility Documentation

- Documentation to support at-risk eligibility determinations varies depending upon:
  - Participation in the Child Nutrition Programs
  - Participation in CEP or Provision 2
  - Base Year or Interim Year CEP or Provision 2 implementation
- Documentation must be the current school year, unless the carryover provision is applicable (Oct count date is within the first 30 school days)
- See attached Documentation Matrix for details

# Direct Certification Uploads

- **School Food Authorities (SFA) are required to perform direct certification uploads four times per year**
  - Prior to start of school
  - October
  - Mid-November to mid-December
  - Mid-February to mid-March
- **SFAs on CEP are required to upload only once**
  - October
- **It is recommended that SFAs complete uploads monthly after the SNAP file is updated**
- **Monthly uploads in July, August, and September will serve to maximize at-risk funding for the district**

# Impact on FRL Counts SY 13-14 to SY14-15

District Code	District Name	CEP Implementation	Change in Free Students	Change in Reduced Students	Change in FRL Students
0100	Alamosa School District RE-11J	Districtwide (3 schools)	0.80%	-31.40%	-3.40%
0580	South Conejos RE-10	Districtwide (3 schools)	31.00%	7.70%	29.40%
0640	Centennial R-1	Districtwide (3 schools)	11.80%	-70.00%	7.70%
0740	Sierra Grande RE-30	Districtwide (1 school)	-13.10%	17.80%	-6.80%
0980	Harrison SD 2	Group (19 schools)	3.70%	14.60%	5.20%
0980	Harrison SD 2	Entire District (24 schools)	2.50%	9.80%	3.50%
2000	Mesa 51	School (1 school)	-27.40%	-115.80%	-32.30%
2000	Mesa 51	Remaining District (50 schools)	2.00%	-8.00%	0.40%
2790	Mountain Valley RE-1	Entire District (3 schools)	-4.80%	-128.60%	-14.30%
2800	Moffat 2 Consolidated	Districtwide (1 school)	26.00%	-6.30%	22.80%

# Reasons for Impacts

- **New Direct Certification system resulted in higher match rates statewide**
- **District outreach increased completion of forms**
- **Parental resistance**
  - **Potential limited information on benefits of completing forms when students received free meals regardless**
- **Change in school enrollment patterns**
- **Change in household economic status**

# Documentation Retention

- Districts must retain all required documentation until audited by CDE or until five years from the certification due date (Nov 10), whichever comes first.
  - Special provision schools must retain base year direct certification data and applications for up to 8 years: The documentation supporting a student as free lunch eligible at a CEP or Provision 2 participating school may be associated with the Base Year (Year 1). Thus, the documentation from the base year must be retained as follows:
    - Year 1: Retained for 5 years from base year - until year 6
    - Year 2: Retained for 6 years from base year - until year 7
    - Year 3: Retained for 7 years from base year - until year 8
    - Year 4: Retained for 8 years from base year - until year 9



# Resources

## At-Risk/Free and Reduced Lunch Count Resources

<http://www.cde.state.co.us/cdefinance/auditunit atrisk freeandreduced>

- Student October At-Risk Resource Guide
- At-Risk Funding and Child Nutrition Programs Memo
- At-Risk and Child Nutrition Program Documentation Matrix
- Family Economic Data Survey Memo
- Family Economic Data Survey English
- Family Economic Data Survey Spanish



# Contacts for Pupil Count and At-Risk Audits

Name	Phone	Email	Primary Duties
Leanne Emm	303-866-6202	<a href="mailto:Emm_l@cde.state.co.us">Emm_l@cde.state.co.us</a>	Associate Commissioner
Jennifer Okes	303-866-2996	<a href="mailto:Okes_j@cde.state.co.us">Okes_j@cde.state.co.us</a>	School Finance Director
Scott Abbey	303-866-6153	<a href="mailto:Abbey_s@cde.state.co.us">Abbey_s@cde.state.co.us</a>	FAST Review Lead
Rebecca McRee	303-866-6805	<a href="mailto:McRee_R@cde.state.co.us">McRee_R@cde.state.co.us</a>	FAST Operations Lead
Melody Barnett	(303) 866-6804	<a href="mailto:Barnett_m@cde.state.co.us">Barnett_m@cde.state.co.us</a>	Field Analyst
Shaheedah Chase	(303) 866-6880	<a href="mailto:Chase_s@cde.state.co.us">Chase_s@cde.state.co.us</a>	Field Analyst
Kharis Eppstein	(303) 866-6879	<a href="mailto:Eppstein_K@cde.state.co.us">Eppstein_K@cde.state.co.us</a>	Field Analyst



# Additional Questions?



# Documentation Matrix

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

1. Pursuant to 1 CCR 301.39 2254-R-8.02, districts should retain all required documentation in a central location until audited by the Department or until five years from the certification due date (November 10) whichever comes first.  
2. The district's food service fund cannot be used for any processing or maintenance of documentation not associated with eligibility for the child nutrition programs as it is an unallowable cost. Other district resources must be used. If the district wishes to have food service personnel process the surveys, the food service fund must be reimbursed for the cost of this processing.

