COLORADO
Department of Education

June 10, 2026



At-Risk Status Field Introduction

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Agenda

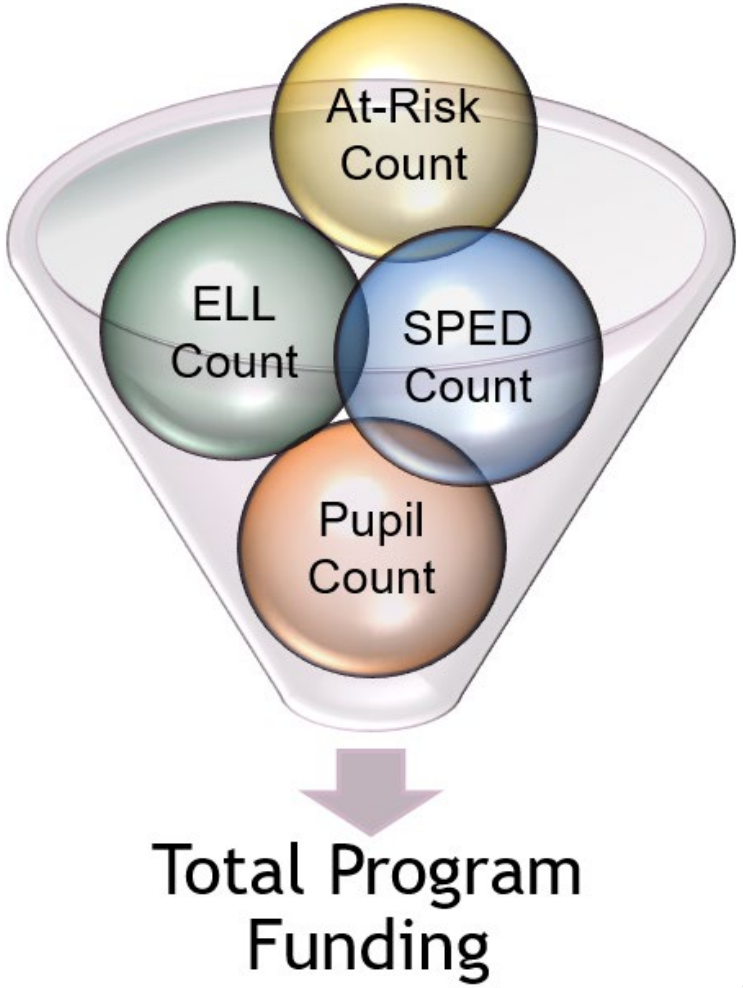
- Review
  - School Auditing Office
  - Student October Count
  - The 25/26 At-Risk Count
- The At-Risk Status Field
- Practice
- FAQ
- Resources



Review

Total Program Funding

- School districts in Colorado are funded by a variety of sources.
- The biggest source of funding comes from the School Finance Act.
- The amount a district receives according to the School Finance Act is called **Total Program Funding.**
- Counts from the Student October Count Data Collection are used to calculate Total Program Funding.



What does the School Auditing Office do?

- Supports districts with guidance on Total Program Funding eligibility and documentation requirements
- Publishes Audit Resource Guides around July 1 each year
- Conducts Annual Audit Reviews of the funded counts used in determining Total Program Funding
  - This is different than a financial audit; we check whether students were reported correctly in the Student October Count data collection
  - Includes reviewing submitted data, audit questionnaires, prior audits, and student-level documentation
- Info & Contact
  - School Auditing Office's Website
  - Email: audit@cde.state.co.us

What was the criteria for inclusion in the 2025-2026 At-Risk Count?

- For the 2025-2026 SY, any student who met all of the following criteria as reported in the Student October Count data submission was included in the district's At-Risk Count:
  - Grades K-12, and
  - Eligible for per pupil funding, and
  - Reported as free or reduced-price lunch eligible
    - Free/Reduced Lunch Price Eligible → Eligibility Status



The At-Risk Status Field

2026-2027 Updates

- File: Student Demographic
- Data Fields:
  - **Updated Definition**—Free/Reduced Lunch Price Eligible
    - Codes remain the same
    - Text updates to provide clarification
  - **Retiring**—Free Lunch Eligibility Identification Field
  - **New**—At-Risk Status Field

Definitions of FRL and At-Risk Status Fields (As described in the 2026 Student Demographic File Layout)

- FRL Field: “Student meets the **current year federal eligibility criteria** for free or reduced-price lunch. Eligibility must be documented using one of the following (current year)…”
- At-Risk Status Field: “An indicator that a student meets the criteria for at-risk funding within the School Finance formula as described in the Rules for the Administration of the Public School Finance Act. This includes an indication of eligible for funding […] or not eligible for funding (paid) and the source of eligibility.”

What is the criteria for inclusion in the 2026-2027 At-Risk Count?

- For the 2026-2027 SY, any student who meets all of the following criteria as reported in the Student October Count data collection will be included in the district's At-Risk Count:
  - Grades K-12, and
  - Eligible for per pupil funding, and
  - Reported as free or reduced-price lunch eligible
    - At-Risk Status Field (NEW!)

At-Risk Status Field

- **Will be used for determining a district's at-risk count and subsequent funding**
- Intent is to aid districts in the reporting of at-risk eligibility given flexibilities in Rule (1 CCR 301-39):
  - 6.02(2): In the absence of current year documentation, districts may use documentation from the prior year.
  - **6.02(4):** Students being reported at CEP schools/sites may use documentation beyond the current or prior year to evidence free or reduced-price lunch eligibility depending on the year of the CEP cycle.

At-Risk Status Field Values

Eligibility: Evidence of Eligibility – Year of Evidence

Free
At-Risk Eligibility

Code	Description
11	Free: Direct Cert – Current Year
12	Free: Direct Cert – Prior Year
13	Free: Direct Cert – Prior Year 2+ (CEP Years 2+ Sites Only)
14	Free: Income Form – Current Year
15	Free: Income From – Prior Year
16	Free: Income Form – Prior Year 2+ (CEP Years 2+ Sites Only)
17	Free: Other Categorical – Current Year
18	Free: Other Categorical – Prior Year
19	Free: Other Categorical – Prior Year 2+ (CEP Years 2+ Sites Only)

Reduced-Price
At-Risk Eligibility

Code	Description
21	Reduced: Direct Cert – Current Year
22	Reduced: Direct Cert – Prior Year
23	Reduced: Direct Cert – Prior Year 2+ (CEP Years 2+ Sites Only)
24	Reduced: Income Form – Current Year
25	Reduced: Income Form – Prior Year
26	Reduced: Income Form – Prior Year 2+ (CEP Years 2+ Sites Only)

Paid
At-Risk Eligibility

Code	Description
31	Paid: No Documents
32	Paid: Current Year Income Form

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Edit Check

- During the Student October Count data submission, an edit check will cross reference a school's code, CEP cycle year, and At-Risk Status field values.
- This check will prevent districts from using Prior Year 2+ values in the At-Risk Status field for students reported at schools that do not have corresponding CEP cycle years.
- Districts will receive an error that will require addressing before finalizing Student October Count data.

Non-CEP Schools & CEP Year 1 for 26/27

- Current year documentation date range: 7/1/26 – 10/1/26
- Prior year documentation in the absence of current year date range: 7/1/25 – 6/30/26
- Districts may use the following values for students attending Non-CEP schools and CEP schools in their first year:
  - Free: 11, 12, 14, 15, 17, 18
  - Reduced-Price: 21, 22, 24, 25
  - Paid: 31, 32

CEP Year 2 for 26/27

- Districts will use the same at-risk values as non-CEP or CEP Year 1 schools/sites
- The difference is that districts with CEP Year 2 schools/sites may use the “best of” status along with supporting documentation
- Documents must come from 7/1/25 – 10/1/2026

CEP Years 3 & 4 for 26/27

- CEP schools in years 3 and 4 of their cycles may use any of the values for the At-Risk Status field, including CEP Years 2+ sites only values
  - Free
    - 13, 16, 19
  - Reduced
    - 23, 26
- Keep in mind that values reporting a status of 2+ Prior Years should only be used by districts who have the capacity to track statuses and retain documentation for multiple years
- Documents may come from 7/1/24 – 10/1/26

Documentation

- Direct Certification
  - The only accepted documentation of direct certification is the export list from the Colorado Nutrition Portal
    - This does NOT include lists from district student information systems (SIS)
    - If a district uses CEP documentation flexibilities, a district needs to save direct certification exports for five years
- Other Categorical (Foster, Migrant, McKinney-Vento/Runaway, Head Start)
  - Liaison/Designee lists
  - Letters from state agencies
- Income Forms
  - The Application for Free and Reduced-Price School Meals (Application)
  - Federal Economic Data Survey (FEDS Form)
  - Combination Form (Combo Form)

2026 FEDS Form Templates - Posted

- At-Risk Count website
  - Family Economic Data Survey (FEDS) for 2026-2027 - English (PDF)
  - Family Economic Data Survey (FEDS) for 2026-2027 - Spanish (PDF)
  - Family Economic Data Survey (FEDS) Family Friendly 2026-2027 Instructions - English (PDF)
  - Family Economic Data Survey (FEDS) Family Friendly 2026-2027 Instructions - Spanish (PDF)
  - 2026-2027 FEDS Determining Official Processing Instructions



Practice

Tips

- Students can have different values in the FRL and At-Risk Status fields
- Districts can use the “best of” eligibility for students reported at CEP schools and sites as long as:
  - The district is capable of tracking statuses and supporting at-risk documentation
  - The district has retained the supporting at-risk documentation
- Districts can report at-risk statuses for students at Non-CEP schools or CEP year 1 schools/sites using ONLY
  - Current year at-risk documentation
  - Prior year at-risk documentation **in the absence of** current year documentation

Scenario 1

- A school in its 3rd year of its CEP cycle, collects a 26/27 income form for a student that shows the student has a paid eligibility. In 24/25, the school's base year, the student was directly certified with a free eligibility. How should the district report the student's FRL and At-Risk Status for 26/27 Student October?
  - A) FRL: Free, At-Risk Status: Free
  - B) FRL: Paid, At-Risk Status: Paid: No Documentation – Current Year
  - C) FRL: Paid, At-Risk Status: Free: Direct Cert – 2 Year+

Scenario 1 Answer

- A school in its 3rd year of its CEP cycle collects a 26/27 income form for a student that shows the student has a paid eligibility. In 24/25, the school's base year, the student was directly certified with a free eligibility. How should the district report the student's FRL and At-Risk Status for 26/27 Student October?
  - A) FRL: Free, At-Risk Status: Free
  - B) FRL: Paid, At-Risk Status: Paid: No Documentation – Current Year
  - **C) FRL: Paid, At-Risk Status: Free: Direct Cert – Prior Year 2+**

The answer is C. Districts should report current year eligibility in the FRL field and, in the case of students enrolled at CEP schools, the district can use the "best of" status with associated documentation in the At-Risk Status Field.

Scenario 2

- A district does not have current year documentation for a student who attends a non-CEP school. Last year, the student was directly certified. How should the district report the student's FRL and At-Risk Status for 26/27 Student October?
  - A) FRL: Paid, At-Risk Status: Free: Direct Cert – Prior Year
  - B) FRL: Paid, At-Risk Status: Paid: No Documentation – Current Year
  - C) FRL: Free, At-Risk Status: Free: Income Form – Current Year

Scenario 2 Answer

- A district does not have current year documentation for a student who attends a non-CEP school. Last year, the student was directly certified free. How should the district report the student's FRL and At-Risk Status for 26/27 Student October?
  - **A) FRL: Paid, At-Risk Status: Free: Direct Cert – Prior Year**
  - B) FRL: Paid, At-Risk Status: Paid: No Documentation – Current Year
  - C) FRL: Free, At-Risk Status: Free: Income Form – Current Year

The answer is A. Districts should report current year eligibility in the FRL field. This district can use the directly certified free at-risk status from last year since it does not have current year documentation at the non-CEP school.



Frequently Asked Questions

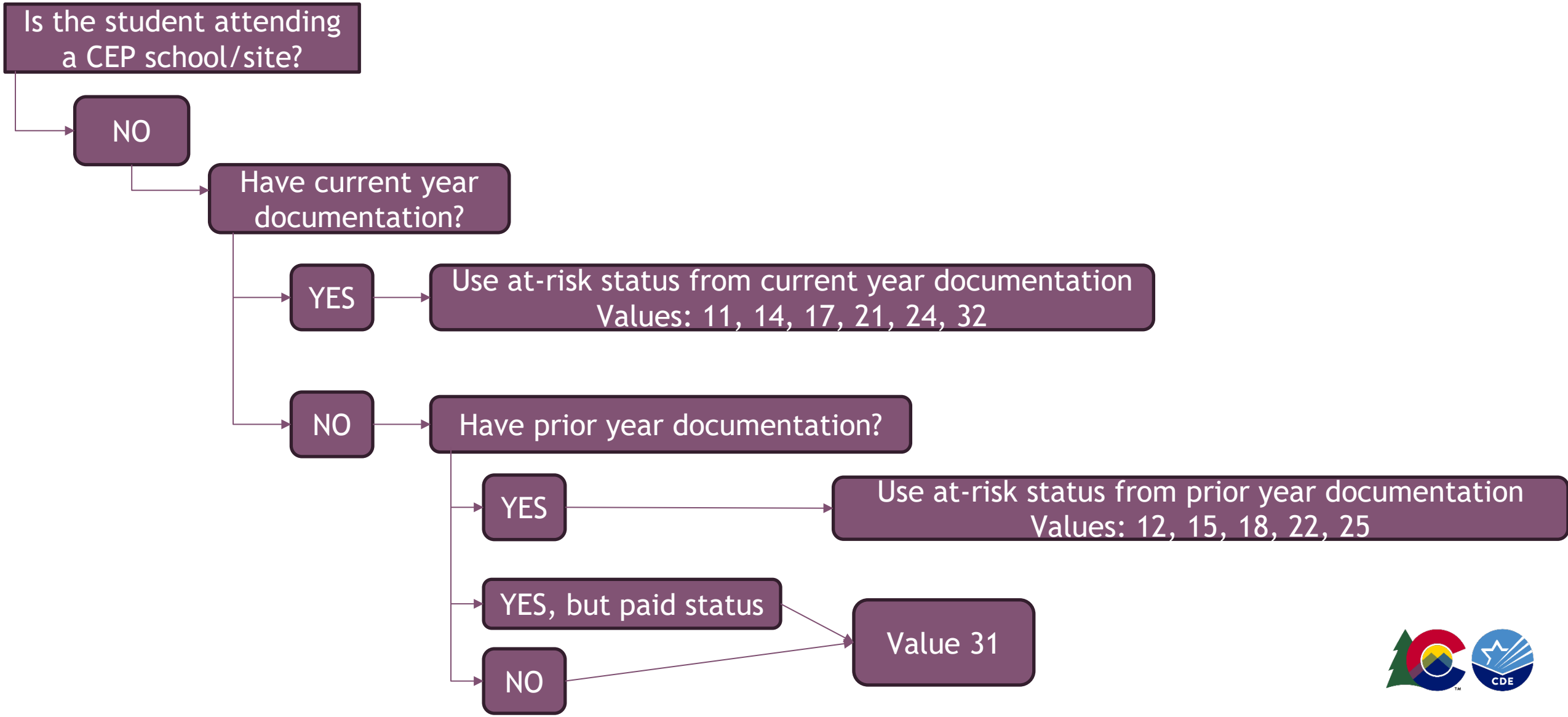
FAQ

- We’re CEP and all our students eat for free. Do I need to collect at-risk status documentation?
  - Answer: YES! A student who eats for free is not automatically given a free at-risk status. For a student to have a free or reduced-price lunch at-risk status, the district MUST provide documentation to support the status. This means:
    - Districts should collect income forms for students throughout the district
    - Districts should run direct certification processes for students throughout the district
    - Districts should collect other categorical liaison lists for students throughout the district
    - Don’t forget students at charters, non-NSLP schools, etc.
  - If a district does do not collect income forms, the district is relying on direct certification processes and to a smaller extent other categorical designation, which vastly limits your district’s at-risk count.

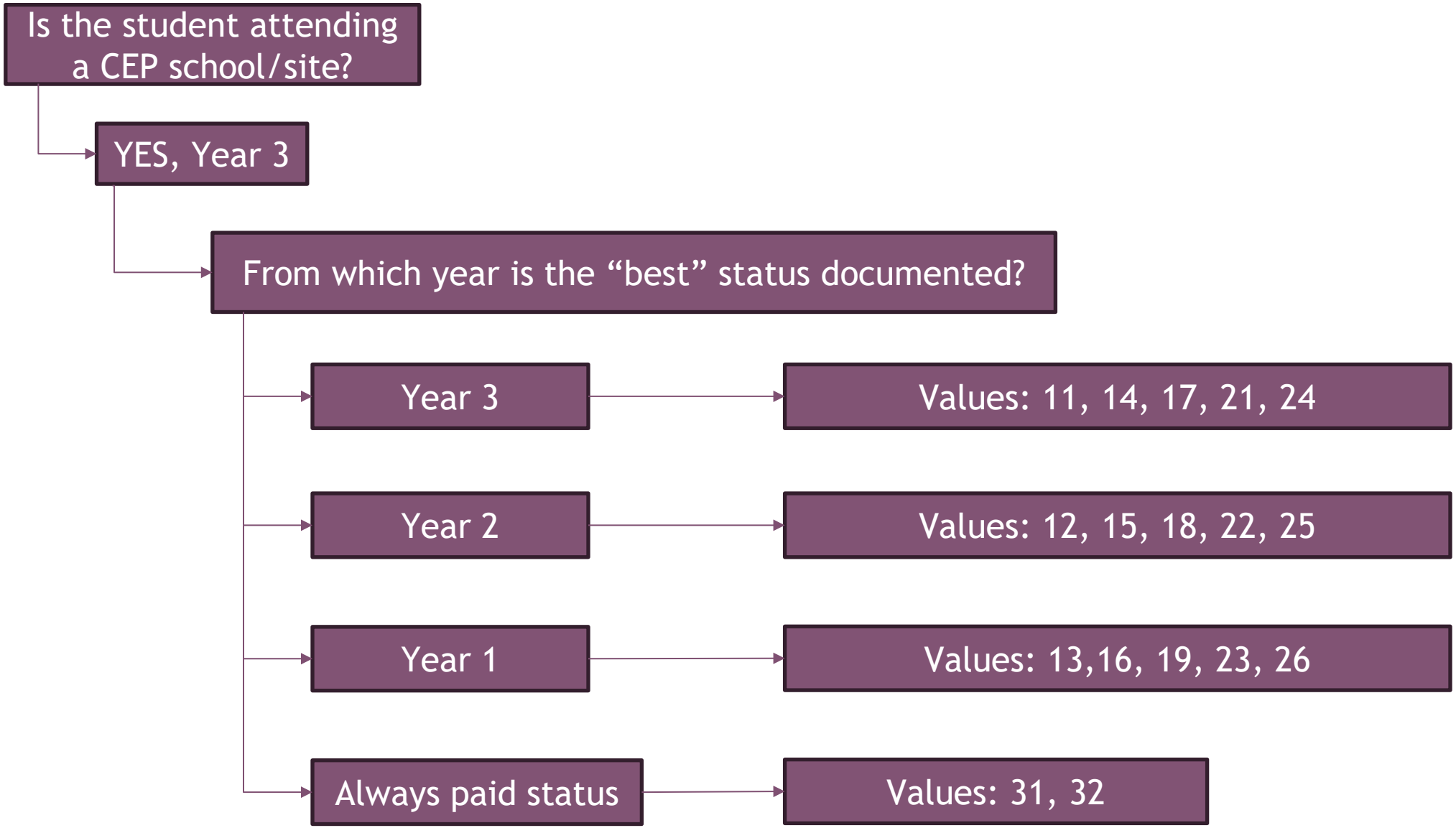
FAQ, cont.

- Which field in Student October will determine a district's at-risk count?
  - Answer: The At-Risk Status field, which is part of the Student Demographic file that is submitted during the Student October Count data collection. The FRL field will no longer be used to determine at-risk counts resulting from the Student October data collection.
- What is a tip to help me determine a student's at-risk status if that student attends a CEP school/site?
  - Answer: At-risk status is determined at the student level while CEP designation is at the school/site level. A tip to help determine a student's at-risk status is to first ask if the student attends a CEP school/site. If so, the district can use allowable documentation from any point during the school/site's CEP cycle. If not, the district can use only current documentation or prior year documentation in the absence of current year documentation to evidence a student's at-risk status.

FAQ: How can I determine at-risk status (Non-CEP)?



FAQ: How can I determine at-risk status if CEP Year 3 in 26/27?



FAQ, cont. 2

- Can I extend a directly certified status from a prior year to a sibling living in the same household for the current year if both students are at a CEP school?
  - Answer: No. The key here isn't the CEP status of the school but rather the timing of the direct certification and extension: the extension must occur in the same year as the direct certification.



Resources

Reporting Resource – COMING!

- CDE's Data Services Unit and the School Auditing Office are working on a COGNOS report to help districts monitor their at-risk counts while submitting Student October Snapshots
- District-level data
  - Free eligibility, reduced-price eligibility, and paid at-risk statuses along with a total at-risk count
- School-level data
  - School code, name and CEP cycle year
  - Free eligibility, reduced-price eligibility, and paid at-risk statuses along with a total at-risk count

CDE Resources

School Auditing Office webpage

- Trainings & Office Hours Webpage
- At-Risk Count Webpage
  - Annual audit resource guides are generally posted on or before July 1st but our office is trying to get this posted earlier
- Emails
  - At-Risk Questions: armeasure@cde.state.co.us
    - **If a district needs one-on-one support or consultation regarding the At-Risk Status Field, reach out!**
  - audit@cde.state.co.us



Questions?