



## **A Federal Agenda for the Child and Adult Care Food Program**

The [Child Care Food Program \(CCFP\) Roundtable](#) and the [National CACFP Forum \(Forum\)](#) are organizations that work to promote access to nutritious meals for children and adults across the country through the Child and Adult Care Food Program (CACFP). The Forum serves as the national advocacy organization that protects viability, perfects policy, and promotes leadership for the CACFP. The CCFP Roundtable is dedicated to improving the health and well-being of our nation's children and believe it's the right of every child to have access to nutritious foods in a nurturing environment. Together, we advocate for the regulations and policies highlighted below to ensure access to the CACFP is equitable, streamlined, and efficient.

### ***Child Nutrition Programs: CACFP***

CACFP is a crucial nutrition support for families with young children and the childcare infrastructure. The CACFP Forum and the CCFP Roundtable urge the Biden Administration to take the following administrative and legislative actions to strengthen program access and support participation of underserved children and communities, provide a safety net for food insecure children and adults in care giving settings, ensure nutritional quality, and simplify program administration and operation. These actions should maintain and build upon the critical gains and lessons learned from the success of flexibilities that have been offered during COVID-19. Furthermore, we believe these advances will improve race equity by removing barriers that significantly affect participation of small child care businesses that are often owned and operated by people of color in communities in most need for expanded child participation.

### ***CACFP***

Strengthening CACFP as a vital support for families and caregivers during COVID-19 and in the future is fundamental to the success of President-elect Biden's commitment to the caregiving workforce ([The Biden Plan for Mobilizing American Talent and Heart to Create a 21st Century Caregiving and Education Workforce](#)). CACFP helps provide nutritious meals and snacks for eligible children and elderly or disabled adults who are enrolled at participating child care centers, family child care homes, afterschool programs, Head Start programs, adult care centers, and homeless shelters. CACFP ensures that children start good nutrition habits early in life, grow healthy and strong, are food secure and are prepared for school by being ready to learn. The program plays a vital role in improving the quality of child care and making it more affordable

for many low-income families. The CACFP plays an essential role in the Biden economic recovery plan to build back our childcare infrastructure by addressing both affordability of care and economic support to caregivers.

### *CACFP Administrative Asks*

**Streamline program requirements, reduce paperwork, and maximize technology to improve program access.** This will improve CACFP's ability to reach low-income families and can be accomplished by implementing the following recommendations (which are consistent with the USDA Paperwork Reduction Work Group's [Report to Congress: Reducing Paperwork in the Child and Adult Care Food Program](#)):

- Modernize applications, eliminate enrollment forms, and expand the use of direct certification to all states;
- Expand the appeals process to resolve disputes over state-specific requirements;
- Simplify the use of expansion funds for rural and low-income areas;
- Allow increased flexibility for carry-over funds for fiscal year 2021; and
- Establish a permanent work group to provide ongoing alignment and support.

**Extend pandemic waivers through the school year 2021-2022 and make permanent the waiver allowing for offsite monitoring by sponsors and state agencies (COVID-19: Child Nutrition Response #39 & #40).** The Biden administration should extend all nationwide waivers that will expire June 30, 2021 to September 30, 2022 to respond to the economic downturn. This authority has been used by USDA to issue several waivers through June 30, 2021, including non-congregate meals, parent pick-up, meal service time, and meal pattern flexibility for the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program. Further, this administration should make permanent the waiver allowing for offsite monitoring by sponsors and centers. Offsite visits have proven to be a highly effective method for maintaining program integrity while allowing sponsors to manage burdensome travel costs and reduce the negative impact to the environment.

### *CACFP Legislative Asks*

- **Provide emergency funding to CACFP sponsors, centers, homes, and afterschool programs to help cover operating-cost deficits that were created by shutdowns, as well as a shift in services, that occurred during COVID-19.** This important provision in the HEROES Act is crucial to maintaining the infrastructure and financial viability of program operators and administrators. Since the onset of the COVID-19 pandemic, CACFP meal reimbursements have decreased significantly. Based on Food Research & Action Center's (FRAC) analysis of the most recent USDA data available, child care providers received \$92.0 million fewer dollars (-29.4 percent) in April 2020 compared to April 2019. [The Child and Adult Care Food Program Participation and Reimbursement](#)

During COVID-19. Child care providers and sponsors are losing reimbursements that are needed to support fixed costs; this loss contributes to deficits in already overburdened child care budgets and compounds instability in the infrastructure for providing child care in the U.S. In June 2020 a survey was conducted of CACFP sponsors; with over 1,200 respondents the need for emergency funding is clear. For family child care sponsors, the decline in claimed homes averaged 27%. For the same time period, center sponsors reported a 72% decrease in participating centers claiming. The sudden decrease of claiming providers creates a stark financial burden for CACFP sponsors with the loss of administrative funds. The loss of these funds jeopardizes sponsors' ability to keep their staff on board and their doors open. The greatest need cited by CACFP sponsors to assist with recovery during the pandemic was financial.

- **Allow child care centers and homes the option of serving an additional meal service (typically a snack or supper), as was previously allowed.** Many children are in care for more than eight hours per day as their parents work long hours to make ends meet, so they rely on child care providers to meet a majority of the children's nutritional needs. Previously, child care providers could receive funding for up to three meals and one snack per day. CACFP support should be restored to the full complement of meals that young children need, and to stop short-changing young children at a time when they, and their families, can least afford it. 10% of families with children 0-5 do not have sufficient food. CACFP in child care settings is an essential component in addressing food insecurity for young children.
- **Allow annual eligibility for proprietary (for-profit) child care centers.** Proprietary child care centers are eligible to participate in CACFP if at least 25 percent of the children they serve are living in low-income households. Unfortunately, USDA requires these child care centers to document institutional eligibility *every month* rather than the annual eligibility allowed for other centers and homes. This creates unnecessary and substantial paperwork and administrative burdens. Many of these child care centers are small, independent operations that provide much-needed care and afterschool programs to low-income children in underserved areas. These centers are facing extreme financial challenges and uncertainty. FNS issued the proposed rule, "Increasing Flexibility for Verification of For-Profit Center Eligibility in the Child and Adult Care Food Program" (7 CFR Part 226 FNS-2018-0009); however, substantial improvements are needed before the rule can effectively meet the intended paperwork reduction goals. Reducing the administrative burdens of nonessential paperwork will provide some relief to these sites struggling to stay afloat.
- **Reduce the CACFP area eligibility test from 50 percent to 40 percent to streamline access to healthy meals for young children in child care.** Area eligibility, the most successful and inclusive CACFP eligibility mechanism, allows family child care homes

in low-income areas to automatically receive the highest CACFP reimbursement rates. This “area eligibility” test needs to be expanded to reach more low-income families in rural, suburban, and other areas. The economic crisis has destabilized all communities and ensuring the stability of the family child care infrastructure through expanded area eligibility is critical.

- **Create a Community Eligibility Provision (CEP) for child care centers participating in CACFP.** Allow child care centers to participate in CACFP without collecting income applications or enrollment forms. Community eligibility relies on direct certification and categorical eligibility to establish a claiming percentage instead of income from income eligibility applications. This has been a successful mechanism in low-income schools.
- **Support sponsoring organizations’ ability to mediate and fix problems through improvements to the serious deficiency process.** FNS-2019-10308, originally published in the Federal Register on May 17, 2019, requested information regarding the serious deficiency process. Improvements need to ensure the process is consistent across states, equitable for all providers, and redefined to include severe and or intentional cases of fraud and abuse, with established thresholds for error rates.
- **Eliminate the ounce equivalent requirement.** Allow meal planners at day care homes and centers in the CACFP to credit grains served as part of a reimbursable meal or snack on household measures (e.g., cups or ‘servings’ of bread and other grain-based foods) instead of “ounce equivalents”. This rule has been delayed once due to the significant confusion and burden it creates for participants in the CACFP. With small businesses already diverting critically important resources to the added health and safety measures brought on by the pandemic, additional resources to support this change are not available. While FNS has created additional tools to help explain the ounce equivalent requirements, the rule, if implemented, will disproportionately penalize providers of color, as well as providers in low income and rural communities and will become a barrier to participation.
- **Allow Youth-Serving Emergency Shelters to Utilize CACFP to Serve Youth up to 24 Years of Age.** Due to the disastrous impact of COVID 19 on the economy more people including youth are struggling to house and feed themselves and their families. It is important to maximize the strength of CACFP in supporting emergency shelters during the COVID 19 pandemic and beyond. Based on feedback from program operators, we recommend allowing youth serving homeless shelters to serve youth up to 24 years of age (this is the age criteria for homeless youth served through the U.S. Department of Housing and Urban Development).

These high priority recommendations are an essential and cost-effective means to strengthen the support of health of vulnerable young children and adults in caregiving settings. They are also

critical to the economic health and viability of the caregiving infrastructure. We thank you for your attention to this matter and look forward to hearing about the action USDA intends to take to address these priorities. If you have any questions, please contact Elyse Homel Vitale ([elyse@ccfproundtable.org](mailto:elyse@ccfproundtable.org)), Reynaldo Green ([Reynaldo.Green@qccga.org](mailto:Reynaldo.Green@qccga.org)) or Jodi Kuhn ([jkuhn@kindercare.com](mailto:jkuhn@kindercare.com)). We stand ready to work with you to address both the immediate health and economic impacts of COVID 19, as well as the opportunity to build a more equitable and successful future for the CACFP.

Sincerely,



Elyse Homel Vitale, MPH  
Executive Director, CCFP Roundtable



Reynaldo Green  
President, National CACFP Forum