



# Leveraging the Child & Adult Care Food Program

*to Promote Healthier Out-of-School Time Settings in Florida*

Children and youth spend up to 15 hours per week in afterschool and other out-of-school time (OST) activities when school is in session, or as many as 40 hours per week during the summer or other extended school breaks. Implementation of healthy eating and physical activity (HEPA) standards and programming in OST settings is a natural complement to school wellness and early learning wellness initiatives. Multiple studies have found that OST programs can make modest improvements in unhealthy weight gain in children and youth.

A focus on OST environments must be part of a comprehensive strategy to prevent childhood obesity.

One tool that states can use to provide healthier meals and snacks for more children and youth in early care and out-of-school-time settings is the federal Child and Adult Care Food Program (CACFP). This resource provides an overview of the program and how it works in Florida, suggests ideas for how it could be leveraged, and highlights some key considerations.



## What is the Child and Adult Care Food Program?

The Child and Adult Care Food Program (CACFP) is a federally funded U.S. Department of Agriculture (USDA) program designed to improve the diets of children and vulnerable adults.<sup>1</sup> Since 1968, CACFP has helped to support child care providers by reimbursing them for snacks and meals provided to low-income children.<sup>2</sup> In 2010, the Healthy Hunger-Free Kids Act expanded CACFP's reach by authorizing reimbursements for meals and snacks provided in eligible afterschool programs in all 50 states.

States are leveraging the CACFP standards in various ways to improve the quality of out-of-school time (OST) program meals and snacks provided to children, including by enhancing the nutrition standards, incorporating the CACFP nutrition standards into the state's child care licensing regulations or voluntary quality programs so they apply to more providers, and by providing additional reimbursement for participation.<sup>3</sup> Florida already has some enhanced standards and could build off this foundation to leverage CACFP in more ways.

## How does CACFP work?

CACFP is directly administered at the state level. In Florida, the Bureau of Child Care Food Programs within the state's Department of Health administers the program, which Florida calls the Child Care Food Program (CCFP). Please see the state's webpage for additional information: <http://www.floridahealth.gov/programs-and-services/childrens-health/child-care-food-program/index.html>.

Participating providers typically are eligible for reimbursements for up to three eating occasions — either two meals and a snack, or two snacks and a meal — so long as those meals and snacks meet the program's requirements. The amount of reimbursement varies, depending on the income of the provider,

the children's family income, and/or the number of children eligible for free or reduced priced meals in the school district where the provider is located. Providers must submit income eligibility applications, which are used to establish the reimbursement rate.

## What is the CACFP At-Risk Afterschool Meals Program?

The afterschool component of CACFP (referred to as the "Afterschool Meals Program" or AMP in Florida) is aimed at providers located in districts with high numbers of at-risk kids. The AMP reimburses for one snack and meal at the highest reimbursement rate (the "free" rate) during the school year.<sup>4</sup> To be eligible for AMP, an afterschool program or center must:

- Be located in public school attendance area where at least 50% of the student population is eligible for free and reduced price meals<sup>5</sup> (the Florida Department of Health compiles a list of qualifying school districts annually)<sup>6</sup>
- Be operated by a public agency, nonprofit organization, or a for-profit organizations that meets certain requirements;
- Provide care for kids and teens up to age 18 (including those who turn 19 during the school year) who are enrolled in school, after school or on the weekends, holidays, or during school vacations on a regular basis during the school year;
- Provide organized activities in a supervised environment;
- Include education or enrichment activities; and
- Be licensed or certified license-exempt.

The AMP is not available during summer breaks, except for providers located in the attendance area of a school that operates year-round.<sup>7</sup> For programs not located in year-round school district, participation in the USDA's Summer Food Service Program may be a good option.<sup>8</sup>

## Federal CACFP nutrition requirements

To be eligible for reimbursement, meals and snacks must meet the following meal pattern requirements:<sup>9</sup>

- **Breakfast:** milk, a vegetable or fruit, and a bread or grain product made with whole-grain or enriched flour/meal.
- **Lunch and supper:** milk, two servings of fruit and/or vegetables, bread or grain product made with whole-grain or enriched flour/meal, and lean protein.
- **Snacks:** at least two out of four possible components: milk, meat/meat alternative, fruit or vegetable, and a whole-grain or enriched bread or grain product.

For more information, see: <http://www.fns.usda.gov/cacfp/meals-and-snacks>.

A proposed rule is pending that would update the federal CACFP nutrition requirements to better align with current nutrition recommendations for children, but a final rule has not yet been released.

- To read the proposed rule, please visit <https://federalregister.gov/a/2015-00446>.
- For more information on how the proposed rule could change existing standards, please visit the Food Research and Action Center's (FRAC) website <http://frac.org/federal-foodnutrition-programs/child-and-adult-care-program/>.

## Florida's enhanced requirements

A handful of states, including Florida, have implemented enhanced CACFP nutritional requirements. States may add requirements as long as the additional standards are consistent with the federal requirements and do not deny access to the program to eligible institutions, subject to approval by the applicable Food and Nutrition Service regional office.<sup>10</sup> States may not disallow meals that are otherwise reimbursable based solely on the



violation of an additional state requirement, but they may require providers to take corrective action.<sup>11</sup> Since 2002, Florida's program (the Child Care Food Program — or CCFP) has implemented enhanced requirements including (among other requirements) limiting 100% fruit juice to no more than once per day; requiring whole-grain or enriched breads; limiting sugar content in cereals to no more than 10 g/serving; and limiting sweet grain foods to no more than four times per week (no more than two snacks, no more than two breakfasts).<sup>12</sup>

## Options for Leveraging CACFP

Similar to Florida, a few other states have implemented enhanced nutritional standards for their CACFP programs. Some states are also using other strategies to leverage CACFP to provide healthy



snacks and meals to more children in child care and OST programs. Below are approaches that could be explored in Florida:

- **Update Florida's enhanced CCFP standards to match or surpass what other states are doing.** For example, New York limits servings of sweet-grain products to no more than twice per week, and defines "sweet cereals" to be those that have more than 6 grams of sugar per adult serving.<sup>13</sup>
- **Update the nutritional standards incorporated into Florida's provider licensing laws to reference the CCFP standards, or at least, the CACFP standards.** Florida's child care licensing laws include some nutritional standards if the provider chooses to provide food. These standards do not refer to the CCFP or CACFP standards, but reference the dietary guidelines that serve as the basis for nutrition standards in these programs (either the USDA's 2011 MyPlate guidelines for child care centers and school-age care providers,<sup>14</sup> or the 2005 MyPyramid guidelines for "family daycare" and large family child care homes).<sup>15</sup> Florida's child care licensing laws are discussed in a separate resource.
- **Expressly incorporate CCFP participation and other key HEPA standards into Florida's Gold Seal Quality Care program.** This program allows child care programs to market themselves as Gold Seal Quality Care programs if they are accredited by an approved accrediting association and meet other standards pertaining to previous violations.<sup>16</sup>
- **Increase the reimbursement available for providers participating in CCFP.** California law provides for an additional reimbursement of \$0.1674 per meal for most meals.<sup>17</sup> (Family home child care providers are only eligible to receive state reimbursement for 75% of the breakfasts and lunches served to participating children and youth.<sup>18</sup>) Last year, Washington D.C. passed a law providing supplemental local CACFP reimbursement of \$0.10 for each eligible breakfast,



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lunch, and supper.<sup>19</sup> The law also provides an additional \$0.05 per lunch and supper to eligible child development facilities that serve a locally grown, unprocessed food as part of the meal (excluding milk).<sup>20</sup>

- **Expand the CCFP program to include up to three meals and a snack.** Expanding the program would allow more providers to provide supper. Washington D.C has done this.<sup>21</sup>

## Key considerations

Some of these approaches would require new legislation, or amendments to existing laws. Others would require the Department of Health to amend existing regulations, or to make changes in how it administers the CCFP program. Most of these approaches would have limited impact on non-licensed providers. All of the approaches would require an appropriation to fund either additional reimbursements and/or technical assistance. Technical assistance would be especially important if nutrition standards are strengthened, and to expand OST provider participation in either the CCFP or the Afterschool

Meals Program to ensure success, and minimize unintended consequences such as providers choosing to stop serving food or dropping out of licensed care.

According to a 2011 USDA report about afterschool programs, training, technical assistance, and other administrative responsibilities are listed as among the greatest barriers to CACFP participation by these programs.<sup>22</sup> In recognition of these barriers, some states provide additional technical assistance and resources in areas related to safe food service, record keeping, nutrition, menu plans, and recipe ideas. Addressing these concerns could greatly increase participation rates.

## Conclusion

Federal nutrition programs such as CACFP are a useful tool for promoting the availability of healthier meals and snacks in child care and OST programs. Florida already leverages CACFP to some degree through its Child Care Food Program (CACFP). There are a variety of ways that Florida could expand participation and coverage of the CCFP to reach even more kids and youth.

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## Endnotes

- <sup>1</sup> 42 U.S.C. § 1766 (2015).
- <sup>2</sup> INST. OF MED., CHILD AND ADULT CARE FOOD PROGRAM: ALIGNING DIETARY GUIDANCE FOR ALL (2010), *available at* <http://www.iom.edu/Reports/2010/Child-and-Adult-Care-Food-Program-Aligning-Dietary-Guidance-for-All.aspx>.
- <sup>3</sup> Beth Wetherbee, The Child and Adult Care Food Program, Policy Changes in Food Selection (2008), *available at* [http://frac.org/newsite/wp-content/uploads/2009/06/de\\_cacfp\\_newfoodpolicychanges.pdf](http://frac.org/newsite/wp-content/uploads/2009/06/de_cacfp_newfoodpolicychanges.pdf).
- <sup>4</sup> During non-school days (i.e., weekends or vacation days), the meal can be served at any time of day approved by the state agency. USDA, AT-RISK AFTERSCHOOL MEALS, A CHILD AND ADULT CARE FOOD PROGRAM HANDBOOK (July 2015) at 10, *available at* <http://www.fns.usda.gov/sites/default/files/atriskhandbook.pdf> (hereinafter, AT-RISK AFTERSCHOOL MEALS HANDBOOK).
- <sup>5</sup> AT-RISK AFTERSCHOOL MEALS HANDBOOK, *supra* note 4, at 8-11; and New York State Dep't of Health, Children's Health and Community Schools PowerPoint presentation (June 3, 2015), slides 32 and 34, *available at* <http://www.p12.nysed.gov/sss/documents/ChildrensHealthandCommunitySchools051515.pdf>. An exception applies to emergency shelters that run afterschool programs with educational or other enrichment activities for homeless children and youth; these shelters are eligible to participate in CACFP no matter where they are located.
- <sup>6</sup> See Fla. Dep't of Health, Child Care Food Program, 50% School List (eff. Feb. 1, 2015), [http://www.floridahealth.gov/programs-and-services/childrens-health/child-care-food-program/guidance/\\_documents/50percent-school-list.pdf](http://www.floridahealth.gov/programs-and-services/childrens-health/child-care-food-program/guidance/_documents/50percent-school-list.pdf).
- <sup>7</sup> USDA, Food and Nutrition Serv., Child and Adult Care Food Program (CACFP): Afterschool Meals, <http://www.fns.usda.gov/cacfp/afterschool-meals> (last visited Aug. 16, 2015). See also AT-RISK AFTERSCHOOL MEALS HANDBOOK, *supra* note 4, at 8.
- <sup>8</sup> See USDA, Food & Nutrition Serv., Summer Food Serv. Prog., <http://www.fns.usda.gov/sfsp/summer-food-service-program-sfsp> (last visited Aug. 4, 2015).
- <sup>9</sup> 7 C.F.R. § 226.20 (2015).
- <sup>10</sup> USDA Food and Nutrition Serv., Memo CACFP 09-2013 (March 29, 2013), at 1, <http://www.fns.usda.gov/sites/default/files/CACFP09-2013.pdf>.
- <sup>11</sup> USDA Food and Nutrition Serv., Memo CACFP 09-2013 (March 29, 2013), at 2, <http://www.fns.usda.gov/sites/default/files/CACFP09-2013.pdf>.
- <sup>12</sup> See Florida Dep't of Health, Nutrition and Menu Planning for Children in the Child Care Food Program (March 2013) at 9, [http://www.floridahealth.gov/programs-and-services/childrens-health/child-care-food-program/nutrition/\\_documents/nmp-workbook-2013.pdf](http://www.floridahealth.gov/programs-and-services/childrens-health/child-care-food-program/nutrition/_documents/nmp-workbook-2013.pdf).
- <sup>13</sup> New York has both required and recommended enhanced standards for its program, which it calls the Healthy Child Meal Pattern. See N.Y. Dep't of Health, Policy Memo 132C (2012), *available at* <http://www.health.ny.gov/prevention/nutrition/cacfp/policymemo/no132c.htm>.
- <sup>14</sup> FLA. ADMIN. CODE ANN. R. 65C-22.005 (2015).
- <sup>15</sup> FLA. ADMIN. CODE ANN. R. 65C-22.005 (2015).
- <sup>16</sup> FLA. STAT. § 402.281 (2015); FLA. ADMIN. CODE R. 65C-22.009 (2015); and FLA. ADMIN. CODE R. 65C-20.014 (2015).
- <sup>17</sup> CAL. EDUC. CODE § 49550; 42238.1. Unfortunately, California lawmakers have failed to pass or approve appropriations to fund these supplemental payments in recent years.
- <sup>18</sup> CAL. EDUC. CODE § 49550 (a) (stating "Notwithstanding any other provision of law, each school district or county superintendent of schools maintaining any kindergarten or any of grades 1 to 12, inclusive, shall provide for each needy pupil one nutritionally adequate free or reduced-price meal during each school day, except for family day care homes that shall be reimbursed for 75 percent of the meals served.")
- <sup>19</sup> D.C. CODE § 38-282 (c)(1) (2015).
- <sup>20</sup> D.C. CODE § 38-282 (c)(2) (2015).
- <sup>21</sup> D.C. CODE § 38-282 (c)(1) (2015).
- <sup>22</sup> USDA, FOOD AND NUTRITION SERV., OFFICE OF RESEARCH AND ANALYSIS, CACFP AT-RISK AFTERSCHOOL MEALS BEST PRACTICES (2011), [http://www.fns.usda.gov/sites/default/files/Best\\_Practices\\_Report.pdf](http://www.fns.usda.gov/sites/default/files/Best_Practices_Report.pdf).